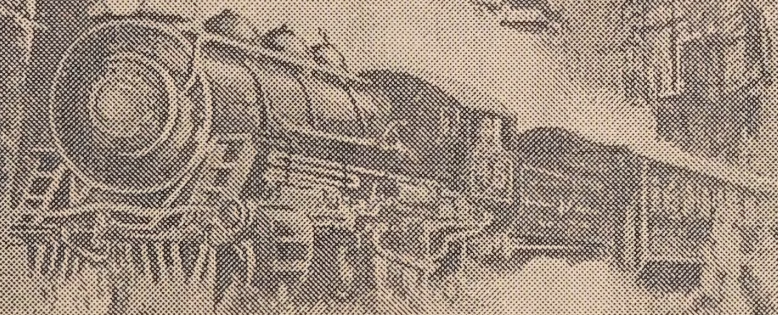


WILLITS GENERAL PLAN REVISION



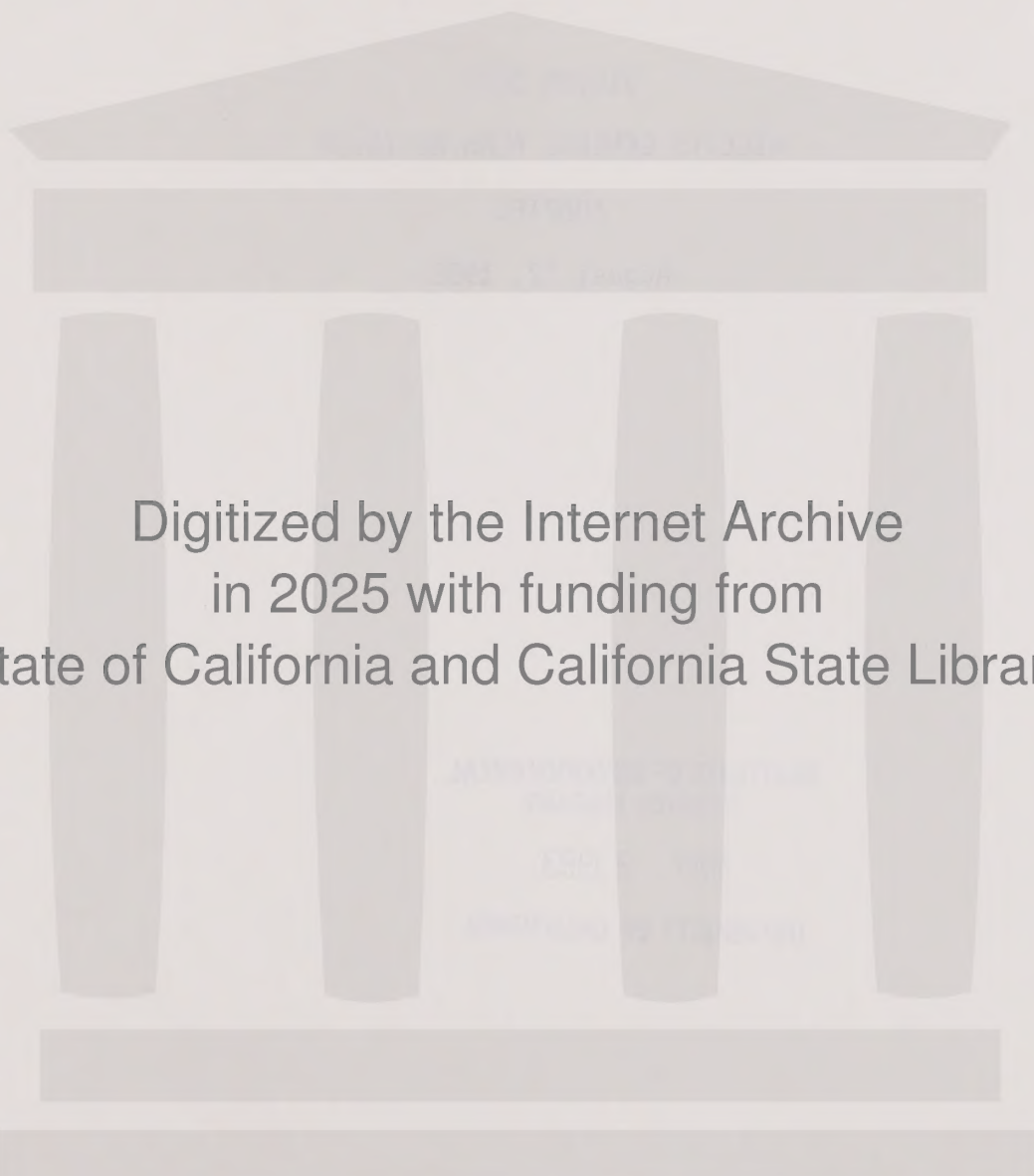
VISION 2020



A Railroading Wonderland
WILLITS, CALIFORNIA

1888

1988



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VISION 2020: WILLITS GENERAL PLAN REVISION

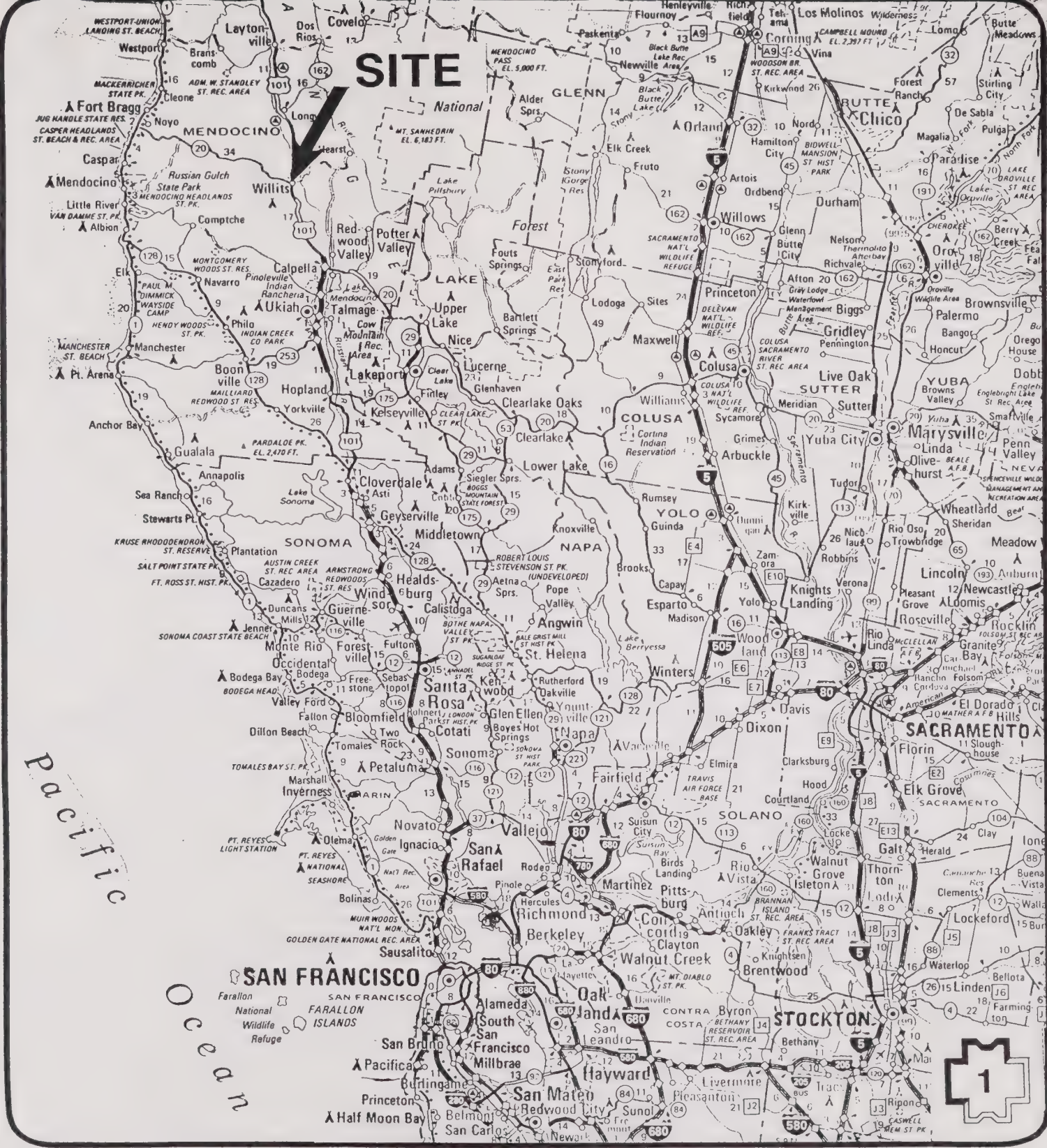
INTRODUCTION

The Willits General Plan is a policy document which establishes a framework to guide the long-term development of the community. The General Plan sets forth the City's goals and policies regarding land use, circulation, housing, conservation, open space, public health and safety. The plan also establishes programs for putting these goals and policies into effect.

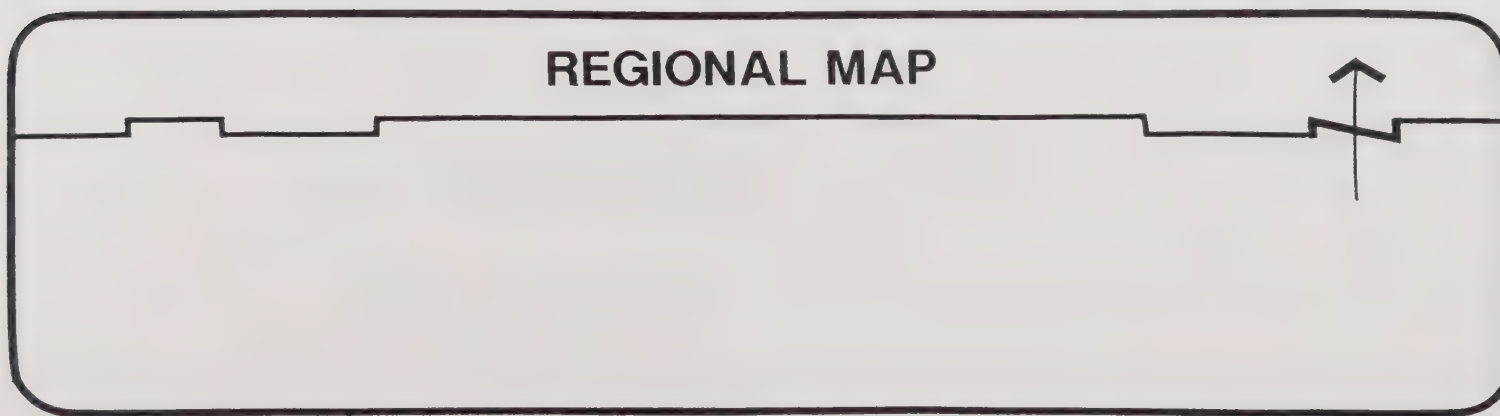
Because of its comprehensive and long-range nature, the General Plan, by necessity, has a broad policy focus. It is neither necessary nor desirable for the General Plan to encompass specific details pertaining to individual properties or development projects. Such details are more appropriately incorporated into Specific Plans and Development Agreements prepared in consistency with the overall General Plan.

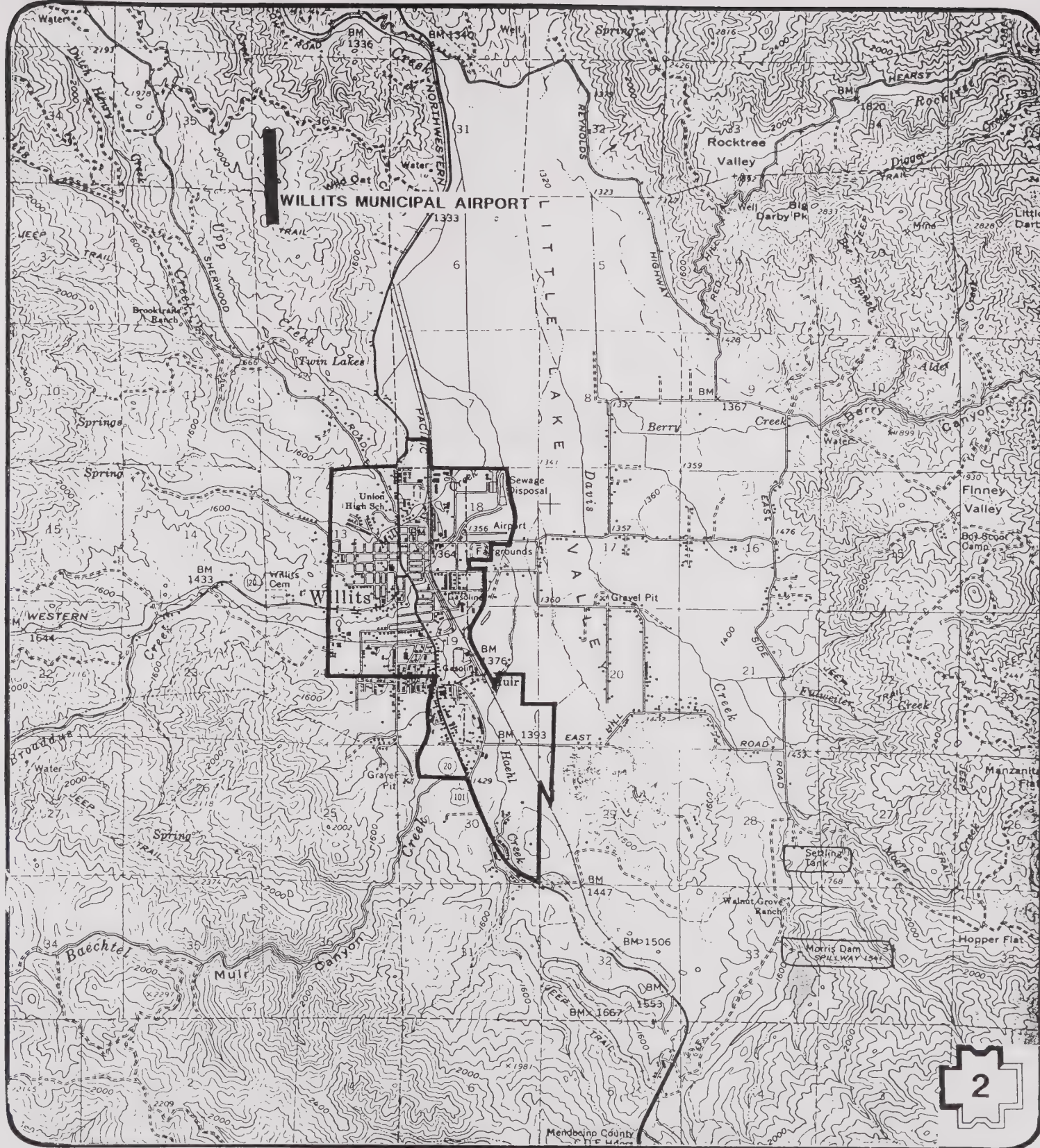
The Willits General Plan is organized into three volumes. Volume One contains goals, policies and implementation measures for each of the eight General Plan Elements (land use; circulation; conservation and open space; noise; housing; public services, parks and recreation; safety; and economic development). Volume 2 contains the background information and analysis upon which both the General Plan policy document and the environmental analysis are based. Volume 3, the Environmental Impact Report, assesses the environmental effects of the General Plan Revision and identifies mitigation measures for reducing adverse effects to acceptable levels. Collectively, Volumes 1 through 3 comprise the Willits General Plan Revision and Environmental Impact Report.

The City of Willits is located in the heart of northern California, approximately 140 miles north of San Francisco (see Exhibit 1). The City occupies the western periphery of Little Lake Valley in central Mendocino County. The immediate vicinity of the General Plan area is illustrated by Exhibit 2.



REGIONAL MAP





VICINITY MAP

WILLITS GENERAL PLAN



VOLUME 1

VISION 2020
WILLITS GENERAL PLAN REVISION
VOLUME 1

1.000 **LAND USE ELEMENT**

1.100 **Land Use Goal**

To achieve an optimal balance of residential, commercial, industrial and open space land uses.

1.200 **Land Use Policies**

1.210 Facilitate local growth in accordance with Scenario 1, identified in Section 2.322 of the Technical Appendices (Volume 2). This scenario calls for an ultimate build-out population of approximately 7,500 residents.

1.220 Minimize potential land use conflicts by defining compatible groups of activities, assigning appropriate land use designations and requiring development standards and buffers to offset adverse project impacts on surrounding properties.

1.230 Give priority consideration to infill development of vacant and underutilized land within the City limits.

1.240 Consider annexations which are consistent with the extension of public services and facilities and other City policies and plans. Possible future annexation sites are shown on Exhibit 3-2 of the Technical Appendices (Volume 2).

1.250 Gateways to Willits shall be designated and identified by well-designed landscaped entrances to enhance access corridors into the downtown area.

1.260 In reviewing proposals for changes in land use, priority shall be given to projects which would result in the creation of employment opportunities.

1.270 Until such time as the community reaches a balance of jobs and housing, commercial and industrial development shall be regarded as a higher priority objective than residential development.

1.280 On lands designated for industrial use, buildings and accessory structures should be designed and located in a manner which will not intrude upon adjacent land uses.

1.290 Encourage agricultural activities on lands designated for industrial use until such time as the lands are utilized for industrial purposes.

1.300 **Land Use Implementation Measures**

1.310 Revise Zoning Ordinance to accommodate changes in land use designations and standards contained in the Revised General Plan.

1.320 Investigate and implement methods of accelerating the project review process for commercial and industrial development proposals which generate employment opportunities.

1.330 Develop design review standards for structures, landscaping and related development to facilitate compatibility with surrounding uses.

1.340 Strengthen the Zoning Ordinance to promote landscaping, specifically:

- (a) prescribe a ratio of trees per parking stalls and require parking lots to be interspersed with landscaping;
- (b) prescribe a minimum proportion of landscaped area for each land use category;
- (c) require landscaping plans to be submitted and approved as part of the application process.
- (d) utilize drought-resistant landscape materials to the greatest feasible extent.

2.000 CIRCULATION ELEMENT

2.100 **Circulation Goal**

To design and maintain a fully integrated local network which provides for safe and convenient circulation using a variety of transportation modes.

2.200 **Circulation Policies**

2.210 Prevent gridlock by maintaining a roadway level of service of LoS D or better on local streets. (See Volume 3, Table 4.2-1 for definition and measurement of roadway levels of service).

2.220 Assess residential developers inside and outside of the City traffic impact fees for roadway improvements and other measures necessary to offset the impact of such development on the local roadway network.

2.230 Enhance the availability and accessibility of alternative modes of transportation, such as walking, bicycling, carpools and buses. Incorporate mass transit facilities such as bus shelters and park and ride lots into the design of public and private development projects.

2.240 Support the proposed U.S. 101 bypass of Willits, including provisions for direct access from the bypass to the downtown Willits commercial area. Continue researching the feasibility of a north/south roadway parallel to U.S. 101 while awaiting bypass approval.

2.250 Support efforts by Brooktrails Township to overcome its circulation constraints, provided that the Township establishes mechanisms, such as impact fees, to offset the impact of future Brooktrails growth on the Willits roadway network.

2.260 Accomplish a 25 percent reduction in single occupancy vehicle trips by 2000. Methods to be employed shall include:

- (a) making the existing circulation network safer and more accessible to pedestrians, bicyclists and car poolers;
- (b) studying and implementing methods of improving and expanding existing bus service; and
- (c) reducing commuting by increasing the number of well-paying jobs in close proximity to Willits residents.

2.270 Promote beautification efforts along the City's roadways.

2.280 Encourage continuation and expansion of passenger, tourist and freight rail service, including the Northwestern Pacific and Eureka Southern freight lines and the Skunk Train.

2.290 Coordinate local transportation planning with the California Department of Transportation and Mendocino County.

2.300 **Circulation Implementation Measures**

2.310 Establish traffic impact fees to secure funding for circulation network improvements necessitated by planned future growth.

2.320 Require traffic impact studies for proposed projects which would generate 50 or more peak hour vehicle trips. Studies shall include mitigation measures designed to maintain adherence to level of service standards contained in the General Plan.

2.330 Improve signage to Willits Airport and to existing public parking facilities in the downtown area. Utilize signage to highlight gateways to the community.

2.340 Designate a network of bicycle routes providing safe passage throughout the City; establish linkages between schools and the designated bikeway.

2.350 Require bicycle storage facilities as a condition of approval for multi-family residential development projects containing 10 or more units and for all commercial development proposals.

2.360 Investigate the feasibility of expanding existing MTA bus service or providing local service from Brooktrails to Evergreen Shopping Center and points in between.

2.370 Conduct a study to assess the need for additional downtown off-street parking.

2.380 Provide additional landscaping, including street trees, along existing roadways. Utilize reclaimed water to the maximum feasible extent to irrigate roadway landscaping.

2.390 Initiate and conduct the planning process for the Willits Airport. Ensure that the airport planning process includes participation from Brooktrails, Mendocino County and other affected jurisdictions and that various alternatives in addition to accelerated commercial development are included in the airport planning process.

3.000 CONSERVATION AND OPEN SPACE ELEMENT

3.100 **Conservation and Open Space Goal**

To ensure that the future growth of Willits occurs in a manner which minimizes adverse impacts on the City's existing plants, wildlife, open space and natural resources.

3.200 **Conservation and Open Space Policies**

3.210 Conserve, to the greatest feasible extent, the City's existing natural resources, with particular emphasis on air and water quality, open space, tree preservation and riparian habitat maintenance and enhancement.

3.220 Ensure that all adverse environmental impacts of proposed development projects are identified and acceptably mitigated prior to approval.

3.230 Ensure that environmental mitigation measures included as conditions of project approval are effectively implemented and maintained over the long term.

3.240 Support the preservation and improvement of buildings and sites of local historical significance.

3.250 Maximize open space preservation on lands outside of the City limits which are not identified for possible future annexation on Exhibit 3-2 (Volume 2).

3.260 Cooperate with regional and state agencies in programs designed to reduce air and water pollution levels.

3.270 Consider utilization of focused Environmental Impact Reports and Mitigated Negative Declarations to address significant adverse project impacts in a cost-effective manner.

3.280 Initiate and/or support local and regional recycling programs, air quality policies, water conservation and watershed preservation efforts.

3.290 Promote alternatives to automobile use as a means of improving local air quality.

3.300 Conservation and Open Space Implementation Measures

3.310 Pursuant to state environmental law, mitigation monitoring programs shall be included as part of the environmental review process for all projects requiring an Environmental Impact Report or Mitigated Negative Declaration. Mitigation monitoring programs shall specify how each mitigation measure will be implemented, which individual or agency will be responsible for follow-up and the time schedule that will be followed in monitoring project mitigation efforts.

3.320 All applications for development within 250 feet of Willits, Broaddus or Baechtel Creeks shall be required to include site-specific field observation by a qualified botanist and a wildlife biologist as part of the application package. This requirement may be waived in the event that the City's Environmental Review Officer determines that the proposed project will have no impact on the riparian corridor or that the site in question has been previously disturbed to the extent that the proposed project would be of minimal environmental concern.

3.330 Within the shaded areas shown on Exhibit 10-1 (Volume 2), field investigation by a qualified archaeologist shall be required as part of the application package for proposed development projects. Any potential adverse cultural or archaeological impacts identified by the field study shall be acceptably mitigated as a condition of project approval.

3.340 Appoint, by December 1993, a Historical Resource Committee to identify historically significant buildings and sites for inclusion on the Historical and Archaeological Resources Map (Exhibit 10-1, Volume 2).

3.350 Study the feasibility of establishing a regional recycling facility in Willits.

3.360 Appoint, by December 1992, a committee to identify local trees of significance and to make recommendations to the City Council toward the formulation of a Tree Preservation Ordinance. Adopt, by December 1993, a City-wide Tree Preservation Ordinance.

3.370 Adopt, by December 1993, an ordinance requiring all newly installed wood-burning stoves to be certified by the U.S. Environmental Protection Agency for low emissions. Also require retrofitting of existing wood-burning stoves to reduce pollution emissions as a condition of approval for all home expansion projects in excess of 1,000 square feet.

Study the feasibility of offering rebates to existing residents to retrofit wood-burning stoves.

3.380 Reduce water pollution due to infiltration by completing all high priority improvements identified in the Sewer System Master Plan by 1995.

3.390 Develop programs to officially recognize and commend the efforts of individual residents to beautify and enhance the local environment.

4.000 NOISE ELEMENT

4.100 **Noise Goal**

To preserve the existing community noise environment, while minimizing the exposure of Willits residents to potentially harmful noise levels.

4.200 **Noise Policies***

4.210 The City seeks to maintain ambient noise levels of 55 dBA (CNEL) in existing residential areas.

4.220 For residential development in areas with existing ambient noise levels in excess of 60 dBA, noise attenuation shall be required to reduce average indoor noise levels to a maximum of 45 dBA.

4.230 All noise sensitive land uses in areas with ambient noise levels in excess of 60 dBA shall require acceptable mitigation of noise impacts as a condition of approval.

4.240 Application processing procedures may require the submittal of appropriate acoustical data so that the noise impacts of proposed uses can be properly evaluated and mitigated.

4.250 Noise from all sources should be maintained at levels that will not adversely affect adjacent properties or the community, especially during the evening and early morning hours.

4.260 Noise created by temporary activities necessary to provide construction or required services should be permitted for the shortest duration possible and limited to time periods that will have the least possible adverse effect on surrounding land uses.

4.270 Uses should be located where they will be most acoustically compatible with elements of the man-made and natural environment.

* See Volume 2, Chapter 5 for definition of terms used in this section.

4.280 On completion of the U.S. 101 bypass, load limits shall be established along Main Street north of State Route 20 to prevent large trucks from traversing this portion of the roadway.

4.300 **Noise Implementation Measures**

4.310 Through the application review process, orient sensitive portions of buildings away from noise sources and encourage utilization of design techniques that will reduce adverse noise impacts.

4.320 Utilize natural terrain to screen structures from major arterials or other noise sources.

4.330 Monitor known noise problems and evaluate complaints regarding new noise sources in order to develop the most practical solutions.

4.340 Should complaints regarding undesirable noise levels increase significantly, the City shall consider an ordinance providing for the control of excessive noise-generating activities.

4.350 Continue to monitor airport noise levels and seek to minimize noise increases, both in Willits and within unincorporated residential areas in the vicinity of the airport.

4.360 Encourage the use of landscaping and vegetation as noise buffers.

5.000 **HOUSING ELEMENT**

Policies and programs contained in this section are based on the Housing Needs Assessment contained in Chapter 7 of the Technical Appendices (Volume 2).

5.100 **Housing Goal**

To promote a variety of housing types to meet the City's projected housing needs.

5.200 **Housing Policies**

5.210 Avoid becoming a "bedroom community" by encouraging residential development which meets the needs of local workers as opposed to commuters.

5.220 Expand the availability of affordable housing by encouraging multi-family residential development on lands designated for commercial use. Encourage mixed residential/commercial development along Main Street and in the area between Main Street and the railroad tracks.

5.230 Initiate efforts to address the shelter needs of the City's homeless and "at risk" families.

5.240 Encourage development of large executive homes by designating additional lands for residential estate use.

5.250 Endeavor, through the approaches set forth in the Housing Needs Assessment (Volume 2) and the policies and programs contained in the Housing Element, to meet the City's share of regional housing need for the 1990-1997 period. The City's share of regional housing need has been estimated as follows:

<u>INCOME GROUP</u>	<u>ESTIMATED # UNITS NEEDED, 1990-97</u>
Very Low	68
Low	29
Moderate	50
Above Moderate	<u>78</u>
TOTAL	225

(Note: Affordability criteria are set forth in the Housing Needs Assessment, Volume 2, Chapter 7).

5.260 Facilitate the private rehabilitation of up to 140 homes by 1997 through identification of available funding sources and informing existing residents of such sources. Conserve, through rehabilitation and replacement, the City's existing number of affordable housing units, which is estimated at 775 (including units affordable to very low-, low- and moderate-income households).

5.270 Actively oppose housing discrimination on the basis of age, race, health, religion, gender, family size or sexual preference.

5.280 Promote energy efficiency in residential construction.

5.290 Avoid concentration of affordable housing in a single portion of the City.

5.300 Housing Element Implementation Measures

5.310 Waive lot line adjustment fees and accelerate the review process for projects in commercial and multi-family areas which would result in affordable housing creation.

- 5.320 Provide information and referral services to victims of housing discrimination. Publish notices of the City's nondiscrimination housing policy and the availability of information and referral service.
- 5.330 Encourage second dwelling unit construction by eliminating public hearing requirements for such units.
- 5.340 Encourage applicants to meet with Pacific Gas and Electric Company regarding energy efficiency early in the process of designing residential development projects.
- 5.350 Pursuant to Section 65915 of the Government Code as amended, provide a density bonus of at least 25 percent or an equivalent incentive to residential developers who agree to price 20 percent of the units at levels affordable to low-income households, or 10 percent of the units for very low-income households, or 50 percent of the units for senior citizens.
- 5.360 Assist in meeting the housing needs of special groups identified in the Housing Needs Assessment by working with local nonprofit organizations to establish home sharing and housing rehabilitation information and referral programs.
- 5.370 Permit emergency homeless shelters and transitional housing on lands designated for commercial and multi-family use.
- 5.380 Earmark 10 percent of hotel bed tax revenues for homeless assistance programs and shelters. Encourage private contributions to local homeless assistance programs and shelters.
- 5.390 Enact a resolution urging the State to provide cost of living differentials for AFDC recipients in high cost urban areas and to provide increased financial assistance for rural communities whose AFDC caseloads have increased more than 50 percent since 1980.

6.000 PUBLIC SERVICES AND FACILITIES, PARKS AND RECREATION ELEMENT

6.100 **Public Services and Facilities, Parks and Recreation Goal**

To develop and maintain a public service delivery network which meets the needs of local residents in a cost-effective and equitable manner.

6.200 **Public Services and Facilities, Parks and Recreation Policies**

6.210 Ensure that development occurs in a manner which is consistent with the ability of local public agencies to provide adequate services and facilities within an efficient cost framework.

6.220 Continue to evaluate the capacity and effectiveness of local water, sanitary sewer, storm drainage and service delivery systems.

6.230 Endeavor to more equitably distribute parks and recreational facilities throughout Willits.

6.240 Establish and maintain a minimum standard of five acres of parkland per 1,000 residents within the City limits.

6.250 Promote a diverse range of parks, recreational facilities and programs to meet the needs of various components of the local population.

6.260 Promote voluntarism as a means of increasing the quantity and quality of local recreational programs.

6.270 Continue to cooperate with local school districts to provide opportunities for recreational use of school and park facilities.

6.280 Endeavor to establish and maintain a local budgetary reserve equivalent to one-half of the City's estimated annual sales tax revenue.

6.300 Public Services and Facilities, Parks and Recreation Implementation Measures

6.310 Require residential developers to set aside lands or provide in-lieu fees to ensure that the City's parkland standard of five acres per 1,000 residents is maintained.

6.320 Require applicants for development projects to finance public infrastructure improvements which would be necessitated by project approval.

6.330 Continue to make the community center and other local facilities available to local groups and organizations for recreational programs.

6.340 Reestablish a committee of volunteers to provide input to the City Council on parks and recreation issues.

6.350 Investigate user fees as a financing mechanism for local public services and facilities.

7.000 SAFETY ELEMENT

7.100 Safety Goal

To provide a local environment that is relatively free from hazards and as safe as practicable.

7.200 Safety Policies

7.210 Cooperate with the Little Lake Fire District in developing standards and guidelines to assure adequate fire protection and the provision of medical and other emergency services for all persons and property in the community.

7.220 Encourage installation of fire safety devices in all residences and require such installation at the time of original construction, remodeling or expansion.

7.230 Establish five minutes or two miles travel distance as the maximum response time or travel distance from the nearest fire station. Outside of this response range, built-in fire protection systems (i.e., sprinklers) shall be required in all new buildings.

7.240 Upon completion of the U.S. 101 bypass, prohibit the transport of hazardous materials along Main Street north of State Route 20.

7.250 Require geologic, seismic and soil analyses and acceptable mitigation of potential impacts for projects proposed within the Alquist-Priolo seismic study zone.

7.260 Technical reports addressing the geologic hazards of development sites within the seismic study zone shall be prepared by an independent geotechnical consultant approved by the City at the expense of the applicant.

7.270 Development of structures designed for human occupancy shall be prohibited within 50 feet of mapped fault traces.

7.280 Ensure that all new construction is built to established minimum standards with respect to seismic safety.

7.300 Safety Implementation Measures

7.310 The Little Lake Fire District shall review all proposed construction projects prior to permit issuance. Conditions of approval pertaining to water supply adequacy, emergency vehicle access, road widths, turning radii and building design features may be submitted by the District based upon its review.

7.320 Maintain regular fire and seismic safety inspection programs, with priority given to emergency facilities, public buildings and older structures.

7.330 Enact zoning ordinance revisions to require built-in fire protection systems for all structures outside of the maximum response range of the Little Lake Fire District.

7.340 Establish inspection procedures to ensure that all grading and foundation work is observed and documented at critical stages of construction.

7.350 Consider fire, flooding, geologic and seismic safety risks in reviewing proposals for development.

7.360 Identify and alleviate safety hazards associated with underground fuel tanks.

7.370 Comply with FEMA standards regarding flood zone management.

8.000 ECONOMIC DEVELOPMENT ELEMENT

8.100 **Economic Development Goal**

Foster and maintain a vibrant, diversified, self-sustaining local economy.

8.200 **Economic Development Policies**

8.210 Achieve and maintain a balance of jobs and housing in Willits.

8.220 Designate industrial employment development and downtown revitalization as the City's two most important economic development objectives.

8.230 Actively recruit new businesses which generate employment while encouraging existing employers to maintain or expand their work forces.

8.240 Continue to support efforts by local businesses to upgrade the quality and appearance of stores, offices and other commercial enterprises.

8.250 Continue to facilitate the provision of infrastructure improvements which promote commercial and industrial development.

8.260 Develop strategies for increasing employment at the Willits Airport.

8.270 Continue to encourage existing area industries in their efforts to retain and expand their local operations.

8.280 Utilize zoning and other regulatory mechanisms to prevent encroachment into industrial areas by incompatible land uses.

8.290 Encourage a diverse range of commercial enterprises to locate within the City in order to strengthen sales tax revenues and expand employment opportunities.

8.300 Economic Development Implementation Measures

8.310 Adopt, by December 1993, a Specific Plan for the revitalization of the downtown commercial area. This plan should include provisions for a "gateway" to Willits in conjunction with the U.S. 101 bypass interchange.

8.320 Continue to initiate efforts to attract new industries to Willits, focusing on businesses which have expressed an interest in the area, including participants in the Solar Energy Expo and Rally and respondents to the Northern California Industrial Development Executives Association advertising campaign.

8.330 Establish mechanisms for determining the needs and concerns of existing area employers and take action in response to the input received.

8.340 Utilize the Redevelopment Agency to generate funds for economic development activities.

8.350 Offer accelerated permit processing for development proposals which will result in the creation of employment opportunities.

8.360 Continue to cooperate with the Chamber of Commerce and other entities active in local economic development efforts.

8.370 Initiate and conduct the planning process for the Willits Airport. Ensure that the airport planning process includes participation from Brooktrails, Mendocino County, the Airport Land Use Commission and other affected jurisdictions and that various alternatives in addition to accelerated commercial development are included in the airport planning process.

8.380 Adopt, by December 1992, an updated Strategic Marketing Plan which identifies and targets commercial and industrial enterprises that can be attracted to Willits.

8.390 Develop, by July 1993, a Community Profile of Willits containing information required by industries seeking to relocate to Willits.

VOLUME 2

CHAPTERS 1 AND 2 OF THE TECHNICAL APPENDICES ARE BACKGROUND REPORTS WHICH WERE PREPARED BY THE GENERAL PLAN CONSULTANT. THE VIEWS EXPRESSED ARE THOSE OF THE CONSULTANT; NOT ALL OF THE POLICY RECOMMENDATIONS CONTAINED IN THE BACKGROUND REPORTS WERE ADOPTED BY THE CITY COUNCIL. SEE VOLUME ONE FOR ADOPTED GENERAL PLAN GOALS, POLICIES AND PROGRAMS.

1.000 ECONOMIC ANALYSIS

1.100 Introduction

The City of Willits has begun the process of revising its General Plan. Revision of the General Plan will result in the adoption of goals, policies and programs designed to guide the progress of the City for the next 20 to 30 years.

Before embarking on policy revisions of such importance, it is necessary to develop an understanding of local economic conditions as they exist today and as they are likely to evolve over the coming years. Economic conditions influence future growth opportunities and can pose constraints to future development. The health of the local economy also plays an important role in determining the standard of living of community residents. For these reasons, long range land use planning should be preceded by a thorough analysis of the local economy. Labor market conditions, retail sales patterns, industrial activity and government finances are among the economic factors of particular importance in preparing plans for future community development.

The purpose of this paper is to provide local decision-makers with an assessment of existing economic conditions and an analysis of future trends in the local economy. Information contained in this study may be useful in determining the likely rate of future population growth, the optimal mix of land uses necessary to accommodate future development and the types of commercial businesses which are likely to be most successful in view of prevailing economic trends.

1.200 Methodology

This study relies upon a combination of analysis of existing labor market statistics and economic growth forecasts and interviews with local community leaders. By analyzing quantitative economic data along with the qualitative impressions of local bankers, real estate brokers, business persons and community activists, a broad view of future trends in the local economy has been derived. This perspective has been applied to the issues of employment, retail sales, industrial development and local fiscal management. Each of these issues has been further analyzed in relation to three alternative future growth scenarios. Finally, recommendations are made with respect to the level of future planned growth and strategies for employment development, retail sales enhancement and local fiscal management.

1.300 Existing Economic Conditions

The local economy in Willits is presently characterized by strong retail sales, stable government finances and a rapidly evolving labor market.

The City functions as a sub-regional commercial center serving a market area of approximately 15,000 people.

1.310 Retail Sales

An increasingly significant role in the local economy is played by retail sales. Nearly one in four nonagricultural jobs in Mendocino County are in the retail trade sector. Taxes generated through retail trade constitute the largest component of local government revenues. Fortunately, because of its geographic location, Willits is well-suited for its role as a retail trade center.

Taxable retail sales in Mendocino County increased by 34 percent between 1984 and 1989 according to the State Board of Equalization. Although this growth rate was somewhat lower than the 40 percent state-wide increase, it is still indicative of a healthy retail sales environment. Locally, retail sales growth appears to be stronger than the County average with the Chamber of Commerce estimating a 13.1 percent increase between 1988 and 1989. In 1989, roughly one out of every nine dollars in County-wide retail sales occurred in the City of Willits. Total 1989 taxable retail sales in Mendocino County by type of business are shown on Table 1-1.

On a cautionary note, both local and County-wide retail sales appear to be disproportionately concentrated in slow growth sectors of the economy. For example, 40 percent of all retail sales in Mendocino County in 1989 were in the automotive and forest products groups; locally, 50 percent of retail sales fell into these categories. These groups only comprised 27 percent of state-wide retail sales. This suggests that consideration be given to diversification of local retail sales, an issue which is addressed in greater detail in Section 1.420.

1.320 Labor Market Conditions

Figures 1-1 and 1-2 illustrate how the structure of the labor market has changed in Mendocino County since 1975. Over this time period, manufacturing employment declined substantially as a proportion of total employment, while jobs in the services and trade sectors increased proportionately. In 1975, more than one-fourth of nonagricultural employees in Mendocino County worked in manufacturing; in 1992 only about one in five workers will fall into this category. By 1992, half of all nonagricultural employees in the County will be working in the wholesale, retail trade or service sectors (See Table 1-2). Because jobs in these sectors often offer lower pay than manufacturing jobs, this transformation of the labor market has important policy implications. Specifically, attention must be given to ensuring retention of existing high-wage employment and attracting new employers in high-wage industrial sectors. Strategies of this nature are discussed in Section 1.430.

Although the local labor market is clearly in transition, there are some signs of strength among existing employers. For example, a telephone survey of 37 Willits area employers conducted in July, 1991 indicated that nearly sixty percent of the respondents expect to increase the size of their work force in future years. This survey included several representatives of the forest products industry, most of whom appear to be optimistic regarding the future of their industry in Willits. It is important in identifying work force trends to acknowledge existing strengths, one of which is the large number of well-paying manufacturing jobs which continue to exist in Willits.

TABLE 1-1: TAXABLE RETAIL SALES IN MENDOCINO COUNTY, 1989
(in thousands of dollars)

TYPE OF BUSINESS	# PERMITS	TAXABLE TRANSACTIONS	PERCENT OF TAX
Apparel Stores	66	\$ 12,104	2.0
General Merchandise Stores	64	60,406	10.1
Specialty Stores	343	34,921	5.8
Food/Liquor Stores	134	61,434	10.3
Eating/Drinking Establishments	234	56,689	9.5
Appliances/Home Furnishings	99	14,960	2.5
Building Materials	78	59,075	9.9
Automobiles, Service and Accessories	162	115,798	19.4
Business/Personal Services	358	31,124	5.2
All Other Outlets	<u>1,399</u>	<u>150,809</u>	<u>25.2</u>
TOTALS	2,937	\$597,320	99.9

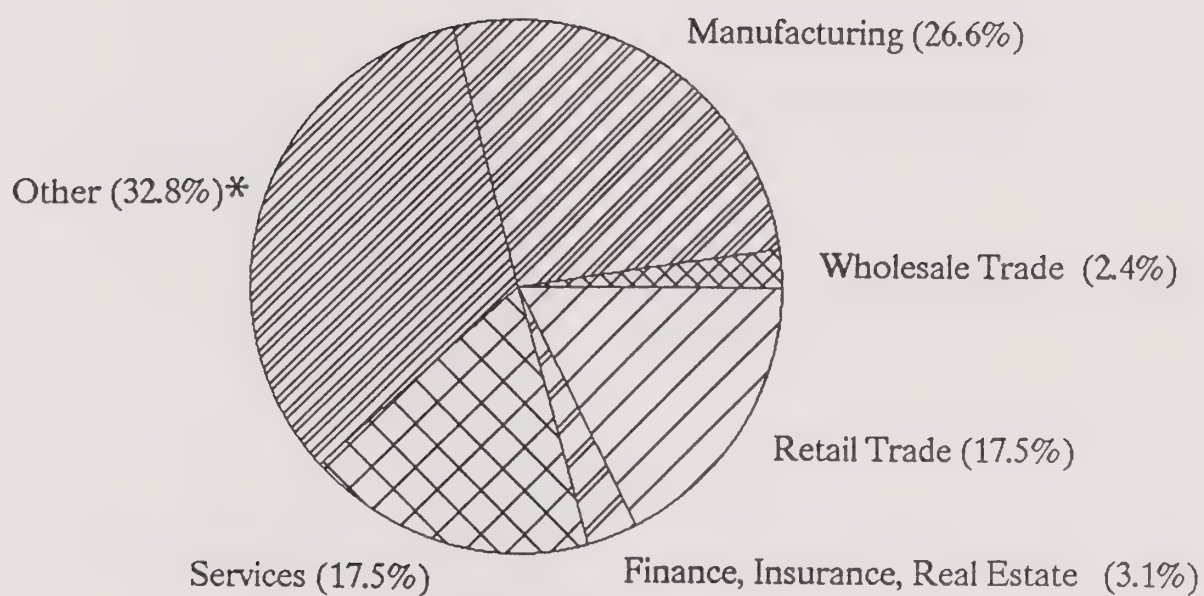
SOURCE: State Board of Equalization, Taxable Sales in California, 1989.

TABLE 1-2: EMPLOYMENT BY INDUSTRY, MENDOCINO COUNTY
1987 Annual Average and 1992 Projected Employment

INDUSTRY TITLE	1987	1992	CHANGE	PERCENT CHANGE
Total Nonagriculture	25,500	28,775	3,275	12.8
Mining and Construction	900	1,000	100	11.1
Manufacturing	5,600	6,100	500	8.9
Nondurable Goods	1,600	1,900	300	18.8
Food & Kindred Products	800	1,000	200	25.0
Other Nondurable Goods	800	900	100	12.5
Durable Goods	4,025	4,200	175	4.3
Lumber & Wood Products	2,875	2,900	25	0.9
Other Durable Goods	1,150	1,300	150	13.0
Trans. & Public Utilities	925	1,025	100	10.8
Transportation	450	550	100	22.2
Communications & Utilities	475	475	0	0.0
Wholesale Trade	1,050	1,300	250	23.8
Retail Trade	5,600	6,650	1,050	18.8
Restaurants & Bars	1,925	2,250	325	16.9
Other Retail Trade	3,675	4,400	725	19.7
Finance, Insurance & Real Estate	875	1,000	125	14.3
Services	5,625	6,425	800	14.2
Hotels & Motels	1,025	1,225	200	19.5
Health Services	1,675	1,825	150	9.0
Social Service Organizations	925	1,025	100	10.8
Other Services	2,025	2,350	325	16.0
Government	4,925	5,275	350	7.1
Federal Government	325	350	25	7.7
State & Local Government	4,575	4,925	350	7.7
Education	2,275	2,425	150	6.6
State	575	575	0	0.0
Local Except Education	1,725	1,925	200	11.6

NOTE: Detail may not add to totals due to independent rounding.
SOURCE: Employment Development Department, Projections of Employment,
1987-92, 1989.

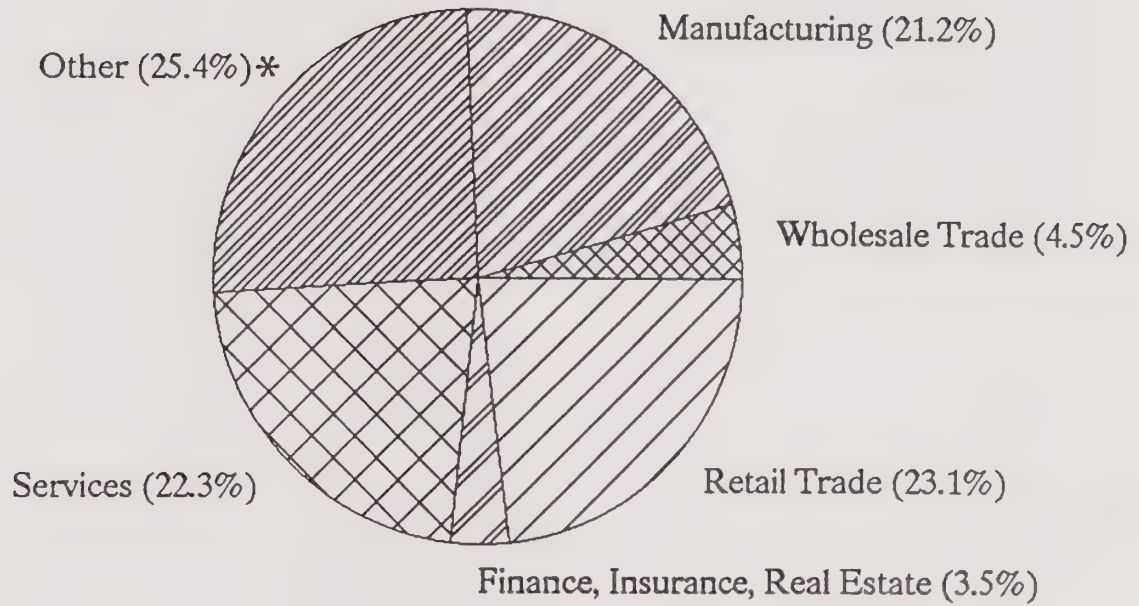
NON-AGRICULTURAL EMPLOYMENT
MENDOCINO COUNTY, 1975



* Includes Mining and Construction, Transportation & Utilities and Government.

Source: Employment Development Department

NON-AGRICULTURAL EMPLOYMENT
MENDOCINO COUNTY 1992 (PROJECTED)



* Includes Mining and Construction, Transportation & Utilities and Government
Source: Employment Development Department

1.330 Local Fiscal Management

Local government finances are an important element of the City's overall economic condition. Sound fiscal management serves to encourage additional investment in the community. By contrast, imbalances in local government finances act as a deterrent to community economic development.

The City of Willits has a strong fiscal base which enables it to offer a full range of urban services to City residents. Sales tax revenues are the basis of the City's fiscal well-being, comprising roughly 40 percent of all local government revenues. Reliance upon sales tax revenues has become increasingly common among California localities since the 1978 passage of Proposition 13, which eliminated property tax increases as a source of local revenue growth. By 1990, property tax revenues accounted for substantially less than 20 percent of the total revenue accruing to the City of Willits. The policy implications of heavy reliance on sales tax revenue are discussed in Section 1.440. Recommendations for strategic fiscal management are offered in Section 1.530.

1.340 National and State-wide Economic Conditions

To some extent, local economic conditions are influenced by fluctuations in the state-wide and national economy. This is especially true with regard to retail sales, which are an increasingly important component of local economic activity. The community's increased dependence upon retail sales for both employment and local government revenue makes it vulnerable to cyclical downturns in the national or state economy. This became evident during the 1990-91 recession, which had a negative impact on local employment, retail sales and tax receipts.

The consensus of most economists is that economic growth during the 1990's will occur at a slower rate than was the case during the previous decade. Declines in Gross National Product during the last quarter of 1990 and the first quarter of 1991 put an end to the longest peacetime economic expansion on record. Although economic growth is expected to resume during the second half of 1991, few expect a return to the robust growth of the mid-1980's. In the near to intermediate future, annual economic growth in the 2-3 percent range would appear to represent a reasonable estimate with respect to the national economy.

At the state level, there are indications that the recovery from the recent recession will be slower in California than in the nation as a whole. Factors such as reductions in national defense expenditures, the effects of a five year drought on the agricultural economy, the tenuous condition of state and local government finances and the continued slump in the housing industry are likely to have a negative cumulative impact on the state's economy. For this reason, economic growth in California is unlikely to outpace national economic growth; a reversal of historic growth patterns which could persist into the next century.

The preceding discussion suggests that the local economy may be becoming increasingly vulnerable to fluctuations in national economic conditions, and that the state of California has, at least temporarily, relinquished its role as a growth leader in comparison with other regions of the country. These findings should be taken into consideration in formulating local strategies for economic development.

1.400 Future Economic Prognosis

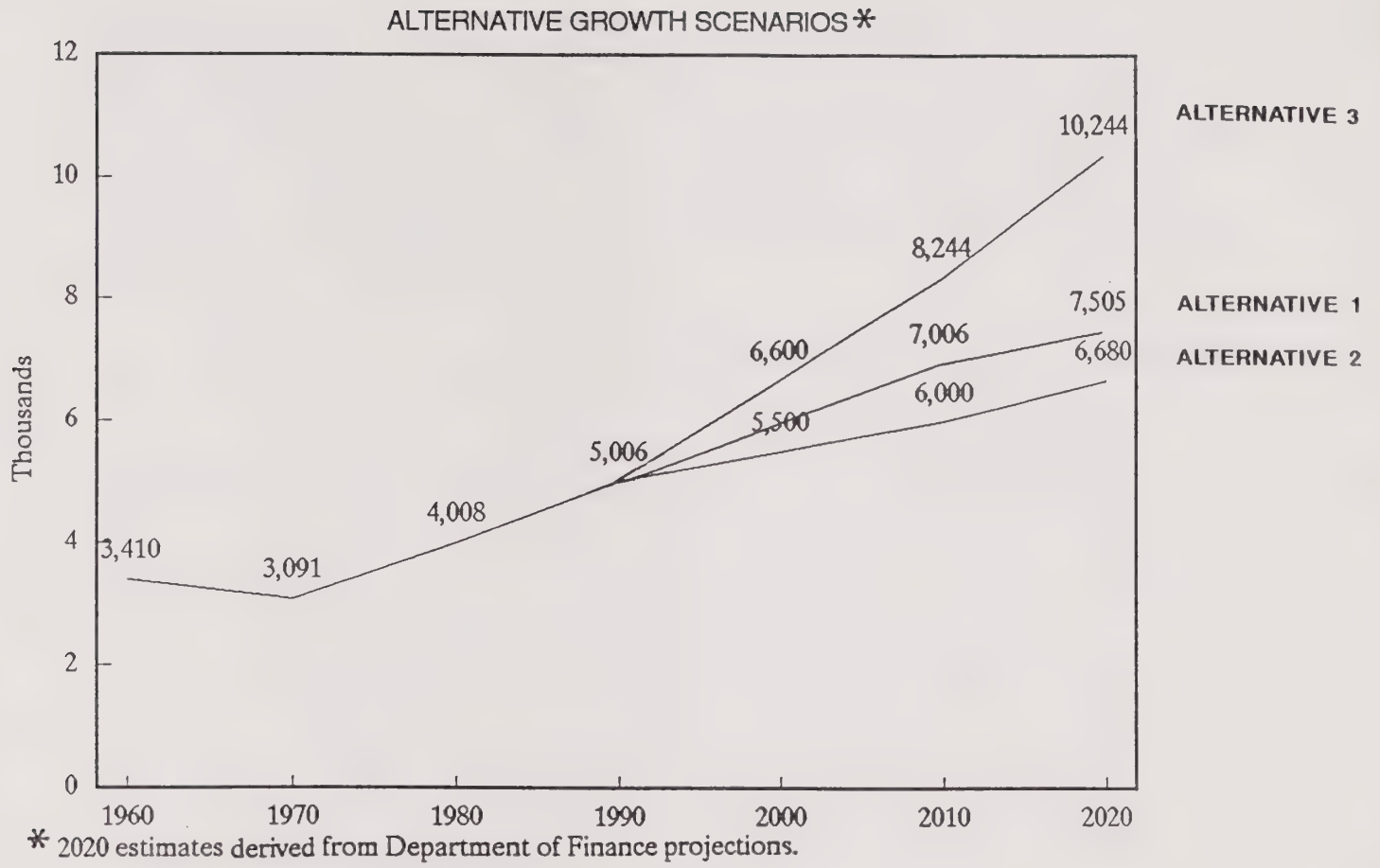
Having analyzed existing local economic conditions, the focus of the study will now shift toward future economic trends. First, three alternative growth scenarios will be set forth. Each of the economic factors identified in the previous section will then be analyzed from the standpoint of the alternative growth scenarios.

1.410 Alternative Growth Scenarios

The Department of Finance has estimated that population growth in Mendocino County will occur at an average annual rate of 1.7 percent between 1990 and 2020. Since the population of Willits has historically followed the same growth pattern as the County as a whole, it is reasonable to assume that future local population growth will occur at or near the 1.7 percent annual rate forecast for Mendocino County. This "existing growth" scenario would result in a total population of 7,505 in Willits by 2020 (See Scenario 1 on Table 1-3). This figure is close to the "build-out" population of 7,700 forecast under the existing Willits General Plan.

To some extent, local development policies can have the effect of either reducing or increasing future population growth relative to growth in other parts of the County. For example, if the community desired a lower population growth rate, it could simply refuse to expand local services and infrastructure and pass other policies making it difficult for future growth to occur. Alternatively, if the City sought to achieve a growth rate in excess of the County-wide figure, it could accelerate efforts to expand the local infrastructure and adopt policies encouraging commercial and residential growth, making it more likely that future growth would occur in Willits as opposed to elsewhere in the County.

Of course there are limits to how much the expected rate of future growth can be reduced or increased by local policy actions. Even if the City prefers a "no growth" approach, some population increase will occur as a result of births and in-migration. Conversely, even if the City seeks unlimited growth, there are limits to the aggregate amount of economic activity which can be attracted. These lower and upper limits have been estimated and are shown as scenarios 2 and 3 on Table 1-3. The population growth trends associated with the three alternative scenarios are shown graphically on Figure 1-3. The underlying assumptions of the three approaches are discussed in detail in Working Paper #2.



The three growth scenarios shown on Table 1-3 constitute the existing, reduced growth rate and accelerated growth rate alternatives. Each alternative would require a somewhat different mix of goals, policies and action programs to be put into effect. Selection of a preferred growth scenario will therefore be a key determinant regarding the types of policies to be included in the Revised General Plan. In the following sections, the likely impact of each alternative will be addressed in analyzing future local trends in employment, retail sales, industrial development and fiscal management.

TABLE 1-3: WILLITS GENERAL PLAN REVISION - ALTERNATIVE GROWTH SCENARIOS

SCENARIO	AVERAGE ANNUAL GROWTH RATE	2020 POPULATION ESTIMATE
1	1.7	7,505
2	1.0	6,680
3	2.5	10,244

NOTE: The 1990 Census estimated Willits' total population at 5,027

1.420 Retail Sales Growth

The prognosis for future growth in local retail sales is dependent upon factors such as the rate of future population and household income growth and the ability of retailers to adjust their marketing strategies to meet the needs of a changing local population. Consistent increases in local retail sales require steady population growth, household income stability and effective marketing efforts.

In terms of population growth, the existing growth scenario identified as Alternative 1 in the previous section would provide, in the opinion of this writer, the minimum level of population growth necessary to sustain a healthy and growing local retail sector. Population growth below this level, as hypothesized under Alternative 2, would provide insufficient incentives for investment by existing retailers and for the attraction of new retail uses. Alternative 3, the increased growth scenario, offers the highest potential benefits for local retailers, provided that the increased sales associated with the higher local population are not offset by adverse environmental impacts such as traffic congestion.

Income growth is a consideration of equal importance to population in determining the prospects for future increases in local retail sales. In

this regard, the local labor market transformation alluded to in Section 2.200 is a matter of concern. Workers in low-wage sectors have lower levels of discretionary income than well-paid workers. It is imperative, therefore, for the City to retain and attract a significant proportion of jobs in middle and upper income categories in order for future population growth to result in higher sales by local retail establishments. Industrial sectors which combine relatively high wages with better than average growth prospects are identified in Section 1.430.

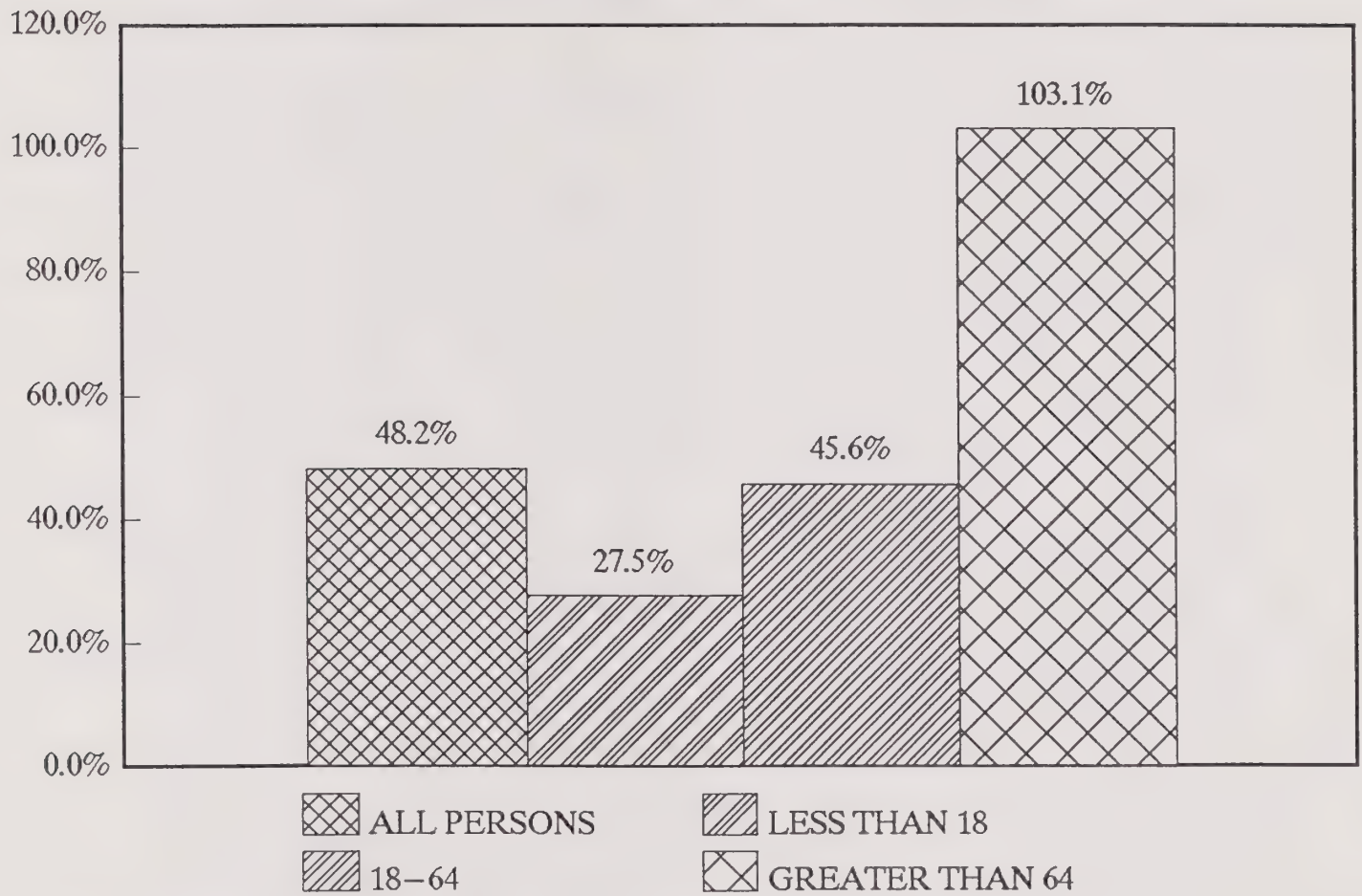
In addition to overall population and household income growth, the changing characteristics of the local population are a key factor in assessing the likelihood of future increases in local retail sales. Population characteristics help determine individual spending behavior, which in turn affects the profitability of local retailers. The most important trend, from the standpoint of retail marketing strategy, is the continued aging of the local population. Figure 1-4 illustrates that the fastest growing component of the County's population is the 64 and over age group which is expected to more than double between 1990 and 2020. By contrast, the number of County residents under the age of 18 will increase by only about one-fourth over this same time period. Clearly, the strongest potential for local retail sales growth lies in product areas likely to attract spending from elderly residents such as drugstores, health care products, gardening supplies, optical equipment and services and recreational vehicles. On the other hand, goods and services which appeal primarily to young people such as records and tapes, stereo equipment, bars and restaurants, motorcycles and amusement parks appear to offer lower potential for future sales growth given the changing characteristics of the local population. The tourism market, of course, constitutes an exception to this general tendency, since tourists do not conform to the same demographics as local residents.

Future increases in local retail sales will require concerted action on the part of both policy-makers and retailers. Local policy-makers should focus on efforts to sustain steady population growth and to facilitate retention and attraction of employers in high-wage industrial sectors. Local retailers should adjust their product lines and marketing strategies to meet the changing needs of a rapidly aging local population and to attract additional sales from tourists. Through these combined efforts, sustained growth in local retail sales can be achieved.

1.430 Labor Market Trends

Earlier in this report it was pointed out that the most rapidly growing employment sectors in Mendocino County are those with relatively low-wage rates, such as retail trade and services. While these sectors represent a significant source of future employment growth, it is also important that job increases occur in sectors such as manufacturing and distribution which tend to include a higher proportion of well-paying positions. With-

PROJECTED POPULATION INCREASE, 1990–2020
FOR MENDOCINO COUNTY BY AGE GROUP



Source: Calculated from Department of Finance Population Projections (1986)

out an influx of high-wage employees future increases in aggregate household income will be limited, thus dampening the prospects for long range local economic growth.

Recent projections by the State Employment Development Department identify wholesale trade and nondurable goods manufacturing, particularly food and related products, as sectors with relatively good prospects for future growth. Many industries within these sectors offer higher wages than the majority of positions in services and retail trade. Wholesale distribution centers, breweries and food processing facilities should be investigated as potential sources of future local employment. Health care represents an additional growth sector with a relatively high proportion of well-paid workers. Finally, alternative technologies including solar energy development and regional recycling facilities offer some potential for employment growth, based on interviews with local industry representatives and residents. Such technologies provide opportunities for job growth in consistency with the City's environmental objectives.

Future increases in retail trade and services employment should be augmented by increases in well-paying jobs in other sectors of the local economy. Over-dependence upon jobs with comparatively low wages and high vulnerability to cyclical shifts in the economy will have the effect of weakening the overall economic health of the community. Consequently, efforts should be made to attract employers from industries outside of the retail and service sectors such as nondurable goods manufacturing and wholesale trade.

Although it is important for Willits to think in terms of diversifying the local employment base, it is equally important that the forest products industry not be written off in a rush toward industrial diversification. While County-wide job growth in the lumber and forest products sector is unlikely to occur over the planning period, employment in the industry will remain at a substantial level. Willits is well-suited geographically to retain a large portion of jobs in this sector. Moreover, because of differences in prevailing wages, it takes up to four new retail and service workers to offset the economic impact of losing one lumber industry job. For this reason, the City should consider policies geared toward retention of lumber industry employment. The City should also encourage diversification of the industry itself, with an emphasis on the manufacture of finished wood products.

With regard to the alternative growth scenarios, the slow growth scenario (Alternative 2) would not permit sufficient growth to accommodate the executive homes which may be necessary to attract managerial and professional workers. Both Alternative 1 (the existing growth scenario) and Alternative 3 (the accelerated growth alternative) would enable the City to grow enough to accommodate some new large homes while continuing to meet its share of regional affordable housing needs. Without some growth, however, it will be difficult to diversify the City's employment base.

1.440 Local Fiscal Management

Among the issues likely to have an impact on future local fiscal conditions are the prospects for retail sales growth, changes in the property tax base and increases in the cost of providing urban services. Heavy dependence on sales tax revenues puts a strong emphasis on retail sales growth as a prerequisite to fiscal balance. Statutory limits on property tax increases make new residential and commercial construction necessary in order to achieve real property tax revenue growth. Perhaps most importantly, increases in the cost of providing urban services necessitate that impact fees be considered as a mechanism for financing improvements in the local infrastructure and that user fees for City services be eventually increased to cover a higher proportion of service delivery costs.

All of the above issues have important implications from the standpoint of the selection of an alternative growth scenario. Should the City grow too slowly, it will be unable to sustain the sales and property tax revenues necessary to retain existing service levels. On the other hand, should the City grow too rapidly, it may be overwhelmed by both environmental impacts and the costs of providing additional services and infrastructure. Clearly, a balance between these two extremes should be sought.

The short and intermediate term outlook for local government finances appears to be quite favorable. Factors which can be expected to contribute to local fiscal balance include household population growth, increases in retail sales and the construction of the U.S. 101 bypass (depending upon its ultimate alignment, as discussed in the following section). The City's long range fiscal health is dependent upon its ability to overcome cyclical fluctuations in sales tax revenues and to accommodate future population growth without overburdening the urban service delivery system.

1.450 U.S. 101 Bypass

Construction of the long anticipated U.S. 101 bypass is scheduled to begin midway through the planning period, around 1999-2000. The alignment of this roadway has yet to be determined, although several alternatives have been studied and discussed.

The consensus of the representatives of the business community interviewed for this report is that the economic well-being of the City would be best served by an east side bypass. Concerns were expressed that an alignment located west of the City would hurt existing local businesses and make it difficult to attract new retail uses. An east side bypass with an interchange leading to an east side "gateway" to Willits appears to offer the strongest potential from the standpoint of downtown economic development. Unfortunately, Caltrans recently deleted all interchanges from its concept plan for the Willits bypass. This decision, if implemented, would have an extremely adverse impact on downtown retail sales. Local efforts to

diversify employment and increase retail sales could be jeopardized by a bypass alignment which draws economic activity away from planned commercial centers. The ultimate alignment of the U.S. 101 bypass is therefore a crucial issue in determining the economic future of the City of Willits.

1.460 Rail Service

Railroads have historically played a key role in the Willits economy. The availability of freight rail service has enhanced the City's role as a regional commercial and industrial center. Rail service via the Skunk train has provided the City with a ready source of tourism dollars. Maintenance and expansion of both freight and tourism rail service are important components of the City's economic development strategy. Development of commuter rail service, on the other hand, appears to be considerably less feasible and is also not necessarily in the best interest of the City, since it would encourage formation of a bedroom suburb, as opposed to a self-sustaining community. Efforts to promote rail should therefore be focused on freight and tourism service along existing established lines.

1.500 Recommendations

This concluding section contains a set of policy recommendations for consideration in formulating the goals, policies and programs to be contained in the Willits General Plan Update. While not all of the recommendations in this section are directly related to land use planning, they all relate to the City's ability to meet its long-range objectives.

1.510 Promoting Retail Sales

1.511 Local policy-makers should allow enough population growth to generate sufficient increases in retail sales to attract new investment and to provide incentives for reinvestment by existing retailers.

1.512 Local policy-makers should continue to encourage and support the efforts of the Downtown Revitalization Committee, which should be more closely coordinated with Chamber of Commerce economic development programs. With this in mind, a Specific Plan for the downtown commercial area should be prepared by 1995.

1.513 Local retailers should study and implement ways of diversifying the products and services they offer to meet the needs of an aging market population and to attract additional sales from tourists. Both the Chamber of Commerce and the Downtown Revitalization Committee may be of assistance in this regard.

1.514 To promote the health of local businesses, an east side alignment of the U.S. 101 bypass should be pursued. An interchange at Commercial

Street is an essential component of the bypass project. Commercial development at bypass interchanges should be severely restricted, if not prohibited.

1.515 In the long run, an eastern "gateway" commercial development project should be planned in conjunction with the U.S. 101 bypass.

1.516 In the short run, the City should advocate on behalf of year-round Skunk Train service to Willits as a means of increasing retail sales.

1.520 Labor Market Strategies

1.521 Intensify efforts to diversify the local employment base, with particular emphasis on nondurable goods manufacturing, wholesale trade and distribution, tourism, health care and alternative energy products. Follow up on the promotional efforts of the Northern California Industrial Development Executives Association (IDEA) by targeting businesses in the above sectors who have responded to the IDEA advertising campaign. Similar follow-up efforts should occur with respect to businesses who participate in the annual Solar Energy Expo and Rally.

1.522 Investigate strategies for attracting industrial development, such as tax breaks, industrial revenue bonds and provision of infrastructure improvements through the local redevelopment agency.

1.523 Designate sufficient sites for larger single family homes to balance the City's housing stock, making the location more attractive for employers. Locate these sites appropriately in relation to existing services and infrastructure and in terms of compatibility with surrounding land uses.

1.524 Study alternatives for increasing the employment generating potential of the Willits Airport.

1.530 Local Fiscal Policy

1.531 Promote revenue base diversification, using mechanisms such as assessments on commercial and residential developers, increases in user fees and the establishment of new fees where appropriate.

1.532 Attempt to establish and maintain a local cash reserve equal to one-half of the projected annual sales tax revenue. Substantial cash reserves are necessary to protect the City budget from unusually steep or prolonged declines in the local economy.

2.000 SUMMARY OF ISSUES AND SUGGESTED PLANNING APPROACH

2.100 Introduction

The first two months of the General Plan Revision work program consisted of using various means to identify the key issues to be addressed by the goals, policies and programs contained in the plan. Methods employed at the issue identification stage included field observation, review of the existing General Plan, interviews with community leaders, a mail survey (see Table 2-1), which was returned by 417 Willits residents, a telephone survey of 37 area employers and a series of four public workshops. The purpose of using a variety of sources at the issue identification stage is to involve the public at an early point in the work plan and to avoid the distortion which may occur in the event of over-reliance upon a single data source. While each of the methods employed have empirical shortcomings, collectively they enable the City to derive an accurate picture of prevailing public opinion.

2.200 Identification of Key Planning Issues

The following sections represent a synthesis of the viewpoints expressed through the various sources listed above. Issues which have been identified as significant include traffic congestion, employment, business and economic development, housing, environmental protection, Brooktrails Township growth and the proposed U.S. 101 bypass.

2.210 Traffic Congestion

Traffic congestion was the most frequently cited local problem throughout the issue identification process. The resident survey, public workshops and interviews with community leaders all were suggestive of strong public concern regarding traffic.

Field observations and existing studies of local traffic indicate that virtually all of the City's existing traffic problems can be found along Main Street (U.S. 101). To a significant extent, these problems will be alleviated by the eventual construction of the U.S. 101 bypass, which will divert through traffic, including most trucks, off of this roadway. In the interim period, however, traffic congestion along Main Street could worsen, creating a need for roadway improvements and policies geared toward promoting alternatives to the automobile, such as bicycles and buses. Such policies should be contained in the Circulation Element of the Revised General Plan.

Future growth at Brooktrails (see Section 2.260) will result in additional traffic volume in Willits. Depending upon the alternative access route chosen for Brooktrails, one of the City's signalized intersections will require improvements to accommodate additional capacity. Provisions

TABLE 2-1: RESIDENT SURVEY RESULTS (N=417) *

1. Please rank the following objectives from 1 to 10 in order of their importance to you.

OBJECTIVE	AVERAGE RANKING (1=MOST IMPORTANT; 10=LEAST IMPORTANT)
Reducing Traffic Congestion	2.9
Increasing Employment Opportunities	4.0
Encouraging Business Development	4.3
Balancing Local Finances	5.1
Retaining Environmental Quality	5.4
Revitalizing Downtown Area	5.6
Promoting Housing Affordability	5.9
Preserving Open Space	6.4
Expanding Recreational Opportunities	6.7
Controlling Growth	7.2

2. Please indicate the extent to which you agree or disagree with each of the following statements. (Results shown in percentages)

STATEMENT	STRONGLY AGREE	AGREE	DON'T KNOW	DISAGREE	STRONGLY DISAGREE
a. The existing level of City services is generally adequate	3.6	61.1	15.8	16.0	3.4
b. Future growth in Willits should be strictly controlled	11.3	29.3	8.4	33.6	17.1
c. Future growth in Willits should be encouraged by local development policies	26.2	50.6	8.2	10.1	4.8

STATEMENT	STRONGLY AGREE	AGREE	DON'T KNOW	DISAGREE	STRONGLY DISAGREE
d. Existing recreational opportunities in the City are adequate	6.9	31.2	11.8	35.6	14.4
e. Existing traffic congestion is a serious problem in Willits	68.5	24.2	1.2	4.8	1.2
f. Willits needs more City parks	7.3	18.8	7.8	52.1	14.2
g. More affordable housing is needed in Willits	25.6	37.2	15.0	17.2	4.9
h. Environmental protection is more important than economic development	14.7	25.5	8.1	35.1	16.5
i. Future growth in Willits should be carefully managed, but not strictly limited	25.3	64.8	2.9	4.3	2.6
j. Commercial development in Willits should be planned primarily to meet the needs of local residents	15.4	47.3	7.1	25.7	4.4
k. Commercial and industrial uses at the airport should be expanded	16.5	31.9	33.3	11.2	7.0
l. The U.S. 101 bypass should be located east of the City	41.2	24.0	17.7	6.7	10.2

3. What are the three most important issues which you think should be taken into consideration by the Willits General Plan Revision.

ISSUE	NUMBER OF RESPONDENTS LISTING
U.S. 101 bypass	113
Traffic Congestion	106
Promoting business growth	96
Attracting employment	91
Affordable housing	80
Increasing industry	54
Revitalizing downtown	47
Environmental quality	43
Parks/Recreation	42
Roadway improvements	37
Growth management	27
Economic development	20

4. Descriptive Characteristics of Respondents

Average Age	52.1
Percent Homeowners	82.6
Number of Years in Willits (average)	21.8
Number of Members in Household (average)	2.79
Number of School Age Children in Household (average)	.74
Mean Household Income	\$35,726

* The total number of responses received was 417. Averages and percentages shown are based on the number of responses received for the individual items, which ranged from 283 to 416 due to missing data.

should be contained in the plan to assure that developers in Brooktrails are assessed a portion of the cost of circulation improvements necessitated by Brooktrails growth.

2.220 Employment

The changing labor market in Willits is discussed in detail in Working Paper #1. Residents, business leaders and local officials have all expressed concern regarding the need for well-paying employment opportunities tied to career ladders. Many residents are concerned that jobs lost in the forest products industry will be difficult to replace with similarly paid positions. Although the City's major employers, including those in the lumber industry, expressed optimism in a recent telephone survey regarding their future hiring plans, it is clear that efforts must be made to attract and retain good jobs in Willits.

General Plan policies can promote employment development by designating sufficient lands for industrial use and by increasing the availability of quality housing and other amenities sought by employers and workers. In addition, all of the policies contained in the plan should be analyzed in terms of their impact on the City's ability to attract and retain a diverse and well-paid work force.

2.230 Business/Economic Development

Promoting business and economic development was recognized by a broad range of participants in the issue identification process as essential to the General Plan revision effort. Many of the City's objectives with respect to housing, employment development and infrastructure improvement will be difficult to achieve in the absence of a healthy and growing business community. Current local efforts to promote business development include the formation of a City Redevelopment Agency in 1985 and programs sponsored by the Chamber of Commerce Economic Development Committee.

Business and economic development can be promoted through the General Plan revision by adopting a preferred growth scenario which permits sufficient expansion to occur and by including policies to support business growth, such as action programs calling for specific plans to be prepared for the downtown area, the airport and an eastern "gateway" to Willits. Economic development can also be encouraged by avoiding policy approaches which may be perceived as detrimental to the business community, such as unduly restrictive zoning constraints.

2.240 Housing

Housing was identified as an issue of concern by a significant number of survey respondents, workshop participants and community leaders. The most

frequently mentioned need is for affordable housing to meet the needs of low-paid workers and their families. The City's changing wage structure, combined with an apparent influx of AFDC recipients driven from the state's urban areas by rising living costs, create a strong demand for housing at the low end of the affordability spectrum. To address this need, State law requires that the Housing Element of the General Plan identify sufficient sites to accommodate the City's low-income housing need and include programs to facilitate attainment of local housing objectives.

In addition to affordable housing, Willits has a need for housing at the upper end of the price spectrum. It is difficult to attract well-paying employment if a City offers few neighborhoods in which well-paid workers would like to live. Identification of suitable sites for single family estate homes may, therefore, be a prerequisite to diversification of the City's employment base.

2.250 Environmental Quality

The environmental quality of Willits is one of the community's most attractive features. Wooded hillsides, undeveloped ridgelines, stream corridors, mature trees and abundant wildlife are all important features of the natural environment worthy of preservation. Historical structures, City parks and rail lines and other aspects of the built environment serve to further enhance the area's environmental quality.

Local opinions concerning environmental quality are as diverse as the varying interpretations of the term itself. The majority of Willits residents seem to prefer that growth be allowed to occur, provided that measures are taken to address its adverse environmental impacts.

The environmental concerns of area residents are discussed further in the General Plan Environmental Impact Report (Volume 3). This report includes estimates of adverse impacts under the preferred growth scenario and under alternative growth scenarios. Specific mitigation measures to offset adverse environmental impacts are included in the EIR.

2.260 Brooktrails Township Development

Brooktrails is an unincorporated community located immediately west of the Willits City limits. The level of future development which occurs in Brooktrails Township will have an influence on the nature, extent and location of future development in Willits. It is essential, therefore, that the potential for Brooktrails growth be assessed and that this assessment be incorporated into the growth scenarios which drive the Willits General Plan revision.

Brooktrails was originally envisioned as a recreational community consisting of small vacation homes. In recent years lots have been increasingly developed for primary residential purposes.

Although the Brooktrails subdivision contains over 6,000 residential parcels, only about 20 percent of the lots are presently developed. Thus, Brooktrails has the potential to accommodate a significant proportion of the future growth which is likely to occur in the greater Willits area. There are, however, serious infrastructure constraints which may preclude Brooktrails from reaching its full development potential. These constraints include water and sewerage availability and, to a lesser extent, roadway capacity. According to one recent report, fewer than 300 additional dwellings can be built at Brooktrails unless water supply constraints can be overcome. Sewerage capacity constraints are estimated to limit Brooktrails to a maximum build-out of 2,057 dwelling units. The limited capacity of Sherwood Road poses an additional constraint to Brooktrails development.

In some respects, it is in the interest of the City for Brooktrails Township to overcome its growth constraints. The City's high dependence on sales tax revenue makes Brooktrails growth desirable in order to maintain and improve local services and infrastructure. Similarly, efforts to promote downtown revitalization would benefit from additional development within Brooktrails. Perhaps most importantly, residential growth which occurs at Brooktrails does not require the same level of local government services as do homes built within the City limits. This enables the City to enjoy many of the revenue benefits of urban growth without paying all of the service costs. For these reasons, the City may wish to consider efforts to assist Brooktrails in overcoming its infrastructure constraints. At the same time, however, Brooktrails Township must recognize that its future growth will have an impact on Willits, particularly with regard to traffic. Mitigation of traffic impacts on Willits should, therefore, be a component of all proposals to remove Brooktrails infrastructure constraints.

Assumptions regarding whether and when Brooktrails Township will successfully address its growth constraints and reach full build-out have been factored into the alternative growth scenarios presented in Section 2.320. Although it is likely that improvement in the circulation, sewerage and water service delivery systems at Brooktrails will be accomplished within the planning period, it is highly unlikely that these improvements will occur at a pace which enables the Township to reach full build-out by 2020. Overall, it seems reasonable to assume that Brooktrails will add about twice the number of housing units as the City of Willits (roughly 2,000) within the 1991-2020 planning period.

2.270 U.S. 101 Bypass

The proposed U.S. 101 bypass of Willits is tentatively scheduled for completion in 2000. Assumptions regarding the likely completion date of the bypass and its ultimate alignment should be taken into consideration in formulating the General Plan growth alternatives. The timing and alignment of this facility are key factors in determining the City's likely future growth pattern.

Several of the participants in the issue identification phase of the General Plan revision effort expressed opposition to the concept of a U.S. 101 bypass at any location. These individuals believe that the bypass will result in increased vehicle traffic traversing the valley, causing adverse air quality impacts.

The purpose of the General Plan revision effort is to identify future events which are likely to occur, plan for them and assess their probable environmental impacts. In the case of the U.S. 101 bypass, this is an event which is likely to occur at some point during the planning period, in spite of the opposition of some area residents. The bypass, therefore, has been incorporated into two of the three growth scenarios discussed in Section 2.320. The environmental impact of the bypass is presently being assessed, with the California Department of Transportation serving as lead agency. Local environmental impacts of the bypass will be included in the General Plan EIR.

In terms of alignment, many representatives of the business community believe that an east side bypass would be best for local businesses. They fear that building a bypass west of the City will discourage travelers from stopping off in Willits, resulting in diminished retail sales growth. An east side alignment would also appear to be desirable based on topographical and environmental considerations. Brooktrails Township has expressed a preference for a west side bypass, indicating that this may be a somewhat contentious issue. Our recommendation, however, is to advocate on behalf of an eastern alignment and to incorporate this assumption into the General Plan revision effort.

Caltrans has recently announced that it will no longer be considering bypass interchanges at State Route 20 or Commercial Street leading into Willits. This decision, if implemented, would seriously jeopardize the City's downtown revitalization efforts and would reduce the beneficial impact of the bypass on the local circulation network. For these reasons, the City should continue to advocate on behalf of at least one interchange, and should include it in the diagram of the City's future transportation system. Construction of the bypass without an interchange leading to downtown Willits would provide regional traffic benefits at the expense of the local economy.

2.300 Suggested Planning Approach

Having identified the various issues to be addressed through the General Plan Revision process, the proposed structural format and growth assumptions to be employed will now be discussed. Upon review, modification and approval by the City Council, the approach outlined herein will be used in formulating the Revised General Plan.

2.310 Proposed Structural Format

As proposed by the consultants, the Revised General Plan and Environmental Impact Report (EIR) would consist of three separate volumes. Volume 1 would include the goals, policies and action statements. All supporting data, maps, background information and analysis pertaining to the General Plan goals and policies would be contained in Volume 2, the technical appendix to the Revised General Plan. The third volume under the proposed structural format would be the Draft EIR. The EIR would reference some of the data contained in the technical appendix and would include analysis such as a review of several different growth alternatives. The advantage of this structural format is that it separates the general policy statements from the technical data which are much more detailed in nature. This allows for appropriate focus to be placed on significant policy questions while still providing the detailed analysis called for by the State planning guidelines. Combining goals, policies and extensive data analysis in a single volume would result in a potentially more confusing document and could lead to an overemphasis on technical details to the neglect of substantive policy concerns. For this reason, separation of goals and policies from the background information on which they are based is recommended.

All three volumes will be published in a single document to facilitate crossreferencing. Following adoption of the revised plan, the City may wish to publish the General Plan goals, policies and programs in newspaper format for use by residents and other interested individuals.

2.320 Alternative Growth Scenarios

General Plan revisions typically include analysis of several different growth scenarios for the community in question. The population and household growth estimates associated with each scenario, as well as the underlying assumptions of each alternative, need to be identified and agreed upon at an early stage to facilitate timely analysis of General Plan growth alternatives. The consultants have devised three proposed growth scenarios for the Council's review and approval. The population and household growth estimates associated with each of these alternatives are presented in Table 2-2. In the following sections, the assumptions which form the basis of the three alternative growth scenarios will be discussed and a preferred approach will be recommended.

TABLE 2-2: ALTERNATIVE GROWTH SCENARIOS

SCENARIO	AVERAGE ANNUAL POPULATION GROWTH RATE	2020 POPULATION ¹ ESTIMATE	2020 HOUSING UNIT ² ESTIMATE
1	1.7	7,505	2,794
2	1.0	6,680	2,604
3	2.5	10,244	3,707

- (1) Growth alternatives based on 1990 U.S. Census estimate of 5,027 population and 1,968 housing units.
- (2) Alternatives 1 and 3 are based on 3 persons per housing unit added after 1990; Alternative 2 is based on 2.6 persons per additional dwelling. The difference is attributable to the assumption that large homes will make up a significant portion of new residential development under the former alternatives, while the latter alternative will not produce enough growth to make residential estate land uses feasible on a large scale, resulting in a lower average household size.

2.321 Growth Factors. Factors to be taken into consideration in estimating the rate of future population and household growth in Willits include:

- (1) The timing and alignment of the proposed U.S. 101 bypass;
- (2) The extent to which Brooktrails growth constraints will be overcome;
- (3) National, state and regional economic policies and conditions; and
- (4) The preferences of local residents as expressed in the form of growth policies contained in the Revised General Plan.

All of these factors were considered in relation to the City's existing and anticipated future land uses in formulating the three alternative growth scenarios discussed below.

2.322 Alternative 1. The California Department of Finance has estimated that the population of Mendocino County will grow by about 50 percent between 1990 and 2020. Historically, population and household

growth in Willits have closely followed the County-wide growth trend. Assuming 50 percent population growth in Willits between 1990 and 2020 results in a 2020 population estimate in the 7,500 range. In terms of underlying assumptions, this alternative is based on the premise that Brooktrails will overcome its growth constraints during the planning period, but will not reach build-out until after 2020. Alternative 1 assumes that an east side U.S. 101 bypass will be completed by 2005. Economically, this scenario relies upon local growth in the range of 1.5 to 3 percent annually. Regarding local policy preferences, Alternative 1 assumes a moderate policy approach toward growth, resulting in a partial build-out of lands designated for future development.

2.323 Alternative 2. Making different assumptions with respect to the growth factors identified in Section 2.321 results in different population and household estimates for 2020. If Brooktrails development constraints are not overcome during the planning period; if the U.S. 101 bypass is not completed; if local economic growth lags persistently behind the rates assumed under Alternative 1; and if the City chooses to restrict future growth using mechanisms such as moratoria or annual limitations on building permits, the population of Willits in 2020 will be closer to the figure represented under Alternative 2, if not slightly lower. Zero or negative population growth, however, are not considered to be likely under any set of circumstances over the long term.

2.324 Alternative 3. In contrast to the previously discussed alternative, which is based on slow growth assumptions, Alternative 3 is intended to represent a maximum feasible population and household estimate for 2020. This scenario assumes that Brooktrails growth constraints will be overcome by 2000 and that the subdivision will be built out within the planning period. It assumes completion of the U.S. 101 bypass by its presently scheduled target date of 2000. Robust economic growth in the 4 to 7 percent average annual range is assumed, along with aggressively pursued local growth policies, resulting in a full build-out of all planned uses as well as some additional annexations. The total population of Willits in 2020 envisioned under this scenario would be well in excess of 10,000 residents.

2.325 Preferred Growth Scenario. To a large degree, the future population of Willits will depend upon factors which are beyond the control of local policy-makers. Decisions by individuals and businesses, macroeconomic factors and occurrences in other jurisdictions all will have an effect on the future of Willits independent of local policy actions. Nevertheless, it is desirable at the outset of the General Plan revision process to identify a scenario which represents the rate of future growth desired by local decision-makers. This is necessary in order to formulate goals, policies and programs which make it more likely that the preferred growth scenario will be attained. The preferred growth alternative will

form the basis of the General Plan Land Use Diagram and Housing Element, as well as the goals, policies and programs contained in the plan. The remaining two alternatives will be analyzed as part of the EIR.

Taking both economic and environmental factors into consideration, it is the judgment of the consultants that Alternative 1 represents the most desirable of the three scenarios. Alternative 1 also appears to be the most likely scenario to occur, based on our understanding of the growth factors previously discussed. It is, therefore, recommended that the City Council adopt Alternative 1 as the preferred growth scenario and direct the consultants to include analysis of Alternatives 2 and 3 in the Environmental Impact Report.

2.400 Conclusion and Recommendations

Upon the approval of this report by the City Council, the remaining work tasks will be conducted using the structural framework, growth assumptions and approaches to key issues that have been identified herein. It is recommended that the City Council review this draft analysis, revise the alternative growth scenarios if necessary, and direct the consultants and staff to proceed with the General Plan Revision in accordance with the issues, assumptions and procedures identified in this report.

3.000 LAND USE APPENDIX

This appendix contains text and diagrams intended to illustrate the City's existing designated land uses, and to identify opportunities for changes in land use which may enhance the City's ability to meet the objectives of the revised General Plan. Exhibit 3-1 constitutes the General Plan Land Use Diagram. This map is the City's official statement of current designated land uses. Exhibit 3-2 illustrates a number of possible changes in land use which may be considered as future amendments to the General Plan.

The purpose of illustrating possible future changes in land use in addition to existing land use designations is to present a vision for the future without locking the City into land use alternatives which subsequently prove to be unworkable. As time progresses, one or more of the land use changes identified in Exhibit 3-2 may be incorporated into the General Plan by the City Council.

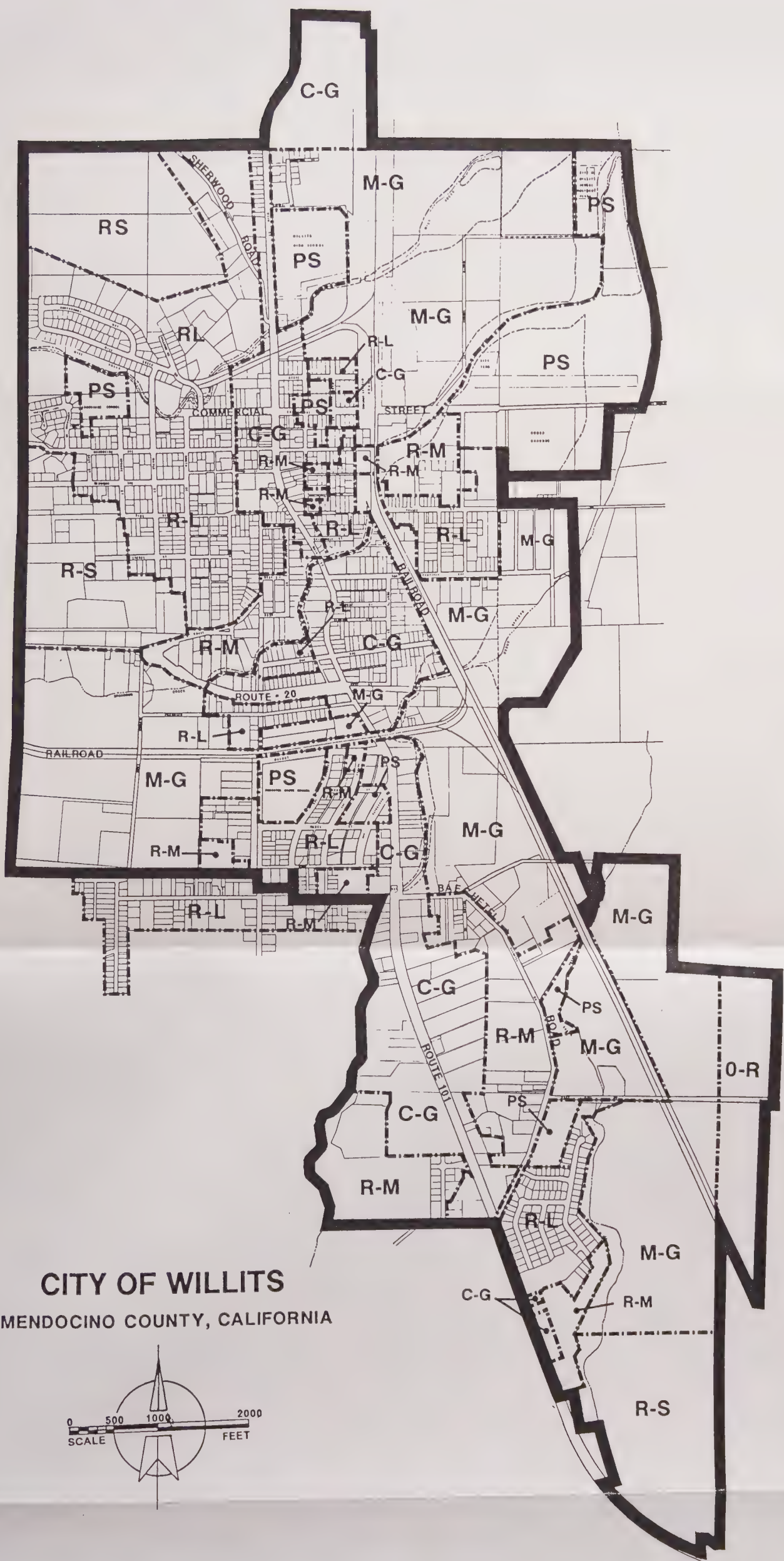
3.100 Existing Land Uses

Table 3-1 shows the existing distribution of land uses in Willits and the approximate amount of developed acreage in each land use category. Most lands within the City limits are designated for residential and industrial use. Commercial lands comprise the third largest category in terms of aggregate acreage with the remainder of the City's lands designated for parks, open space and public facilities. Exhibit 3-1, the General Plan Land Use Diagram, serves as the City's official map of designated land uses. Land use density and building intensity standards are set forth in the zoning ordinance and summarized on Table 3-2.

3.200 Possible Future Changes in Land Use

Exhibit 3-2 identifies a number of locations at which the Council may wish to consider changes in land use designations at some point in the future. West of U.S. 101, lands outside of the City limits presently designated as agricultural open space have been identified for possible annexation and designation as residential estates. North of Willits High School, along U.S. 101, a 30 acre parcel designated for commercial use is well-suited for conversion to a mobile home park. Future planning efforts are recommended for the airport, gateway and downtown areas.

In addition to the above changes, three areas are identified for possible future planning efforts; downtown, the airport and the eastern "gateway" area located along Commercial Street in the vicinity of the railroad station. It is recommended that a Specific Plan be prepared for each of these three areas by 2000. The downtown area Specific Plan should focus on developing an integrated theme around which to center the City's revitalization efforts. The airport Specific Plan should place an emphasis on



3-1

LEGEND

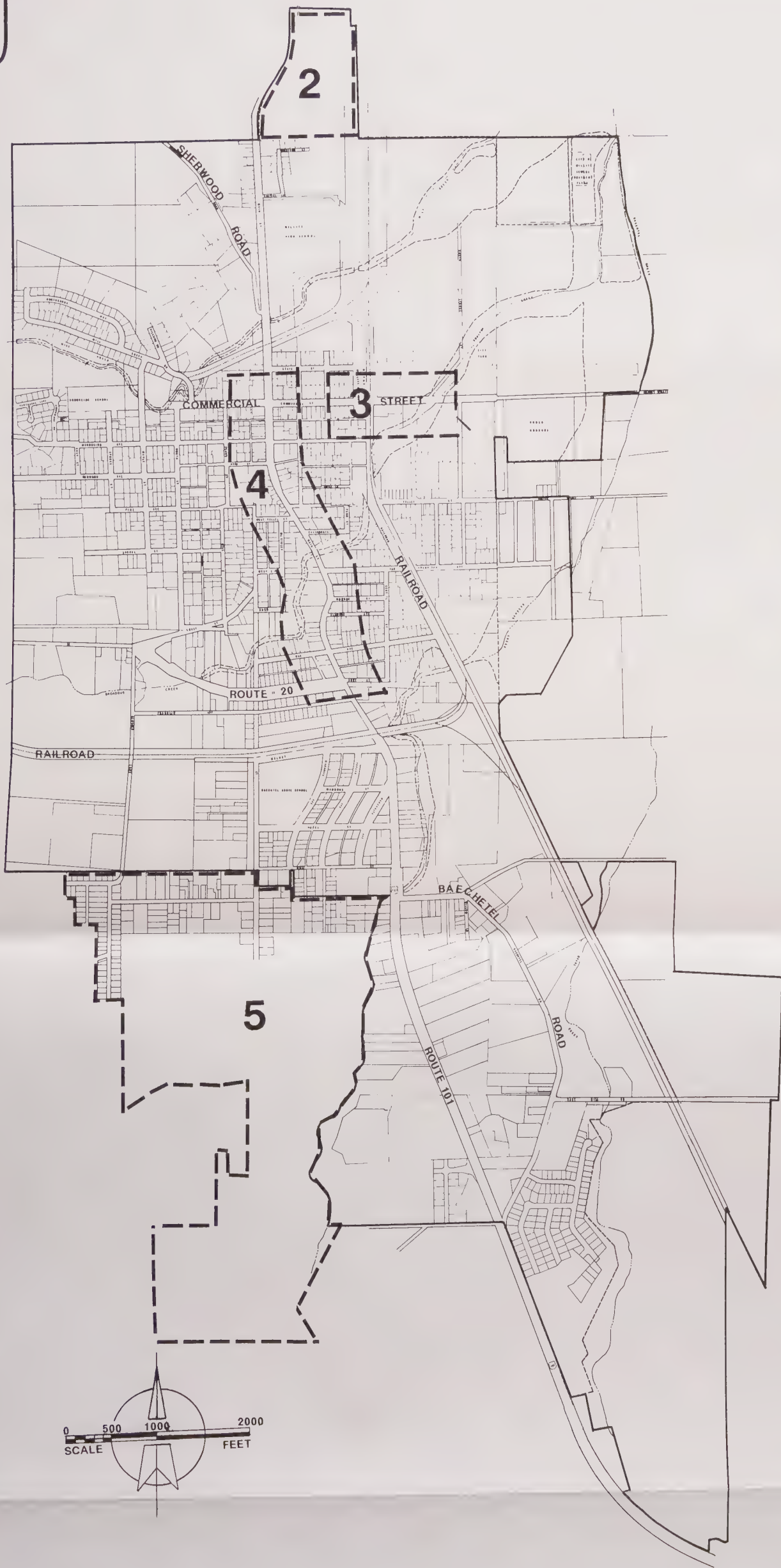
R-S: RESIDENTIAL-SUBURBAN
R-L: RESIDENTIAL-LOW DENSITY
R-M: RESIDENTIAL-MEDIUM DENSITY
C-G: COMMERCIAL-GENERAL
M-G: INDUSTRIAL-GENERAL

PS: PUBLIC SERVICE
O-R: OPEN SPACE-RECREATIONAL
— CITY LIMITS
--- DESIGNATION BOUNDARY

WILLITS
GENERAL PLAN

GENERAL PLAN
LAND USE DIAGRAM

1
AIRPORT



LEGEND

1. AIRPORT SPECIFIC PLAN
2. MOBILE HOME PARK EXPANSION
3. GATEWAY SPECIFIC PLAN
4. DOWNTOWN REDEVELOPMENT SPECIFIC PLAN
5. SOUTHWEST ANNEXATION

WILLITS
GENERAL PLAN

POSSIBLE FUTURE
CHANGES IN
LAND USE

3-2

TABLE 3-1: GENERAL PLAN MAP DESIGNATIONS

Residential-Suburban (R-S). This classification is for application to suburban or rural areas in which existing or desirable future parcel sizes, soils, topography and surrounding uses indicate single family developments on sites of 20,000 square feet or larger are appropriate with wells and/or septic tank sewage disposal. Consistent zoning may permit limited livestock raising, agriculture, and recreational uses subject to permit controls.

Maximum density: one family per 20,000 square feet

Minimum parcel size: 20,000 square feet

Residential-Low Density (R-L). This classification is for application to extensive areas in and around the City in which the dominant use is, or is proposed to be, single family residential, where access and lot patterns are suitable for such use, and where urban services including water and sewer systems are installed or available.

Maximum density: one family per 6,000 square feet

Minimum parcel size: 6,000 square feet

Residential-Medium Density (R-M). This classification is for application to limited areas of mixed density residential uses or new development areas most suitable for duplexes, multi-family, apartment or professional office uses, where all urban services are available, and where schools, parks, commercial facilities, etc. are in convenient proximity.

Maximum density: one family per 1,500 square feet

Minimum parcel size: 6,000 square feet

Commercial-General (C-G). This classification is for areas which are used for administrative office, general commercial, and heavy commercial purposes, or which are proposed for such use in the future because of location, access, need, and service potential. Such areas may be for local neighborhood service, for central business districts purposes, or for highway traffic services.

Industrial-General (M-G). This classification is for application to land areas which are best suited for a variety of industrial operations because of access, location, availability of power, water, sewer services and transportation facilities, and where their operations will be compatible with adjacent uses. Zoning regulations must be applied in relation to the particular operations to ensure freedom of operation without detrimental impact upon adjacent uses.

Maximum density: per appropriate zoning

Minimum parcel size: per appropriate zoning

Public Service (PS). This classification is for application to public sites of schools, parks, civic centers, fairgrounds, airports, museums, libraries, auditoriums, corporation yards, hospitals, social service centers, and similar uses, and may be applied to quasi-public and public utility sites.

Open Space - Recreation (O-R). This classification is for application to sites which are to be used primarily for open space and/or recreation purposes.

Agricultural - General (A-G). This classification is for application to areas which are suitable for agricultural production because of historical use or future potential based on soil capability.

Conservation - Floodway (FW). This classification is for application to waterways and primary drainage channels to indicate the need to protect channels for the free flow of storm waters and to regulate the use of land in adjacent floodplains for the protection of persons and property. Lands designated FW are shown on Exhibit 9-1. For information purposes, they are also shown on the General Plan display map.

Historical Resources (H). This classification is for application to historical resources within the community. The purpose of the Historical Resources classification is to encourage the preservation and enhancement of unique historical resources in the City of Willits. Lands, designated H are shown on Exhibit 10-1. For information purposes, they are also shown on the General Plan display map.

Maximum density: per appropriate zoning

Minimum parcel size: per appropriate zoning

TABLE 3-2: EXISTING LAND USES

LAND USE CATEGORY	# ACRES ¹	ESTIMATED # ² DEVELOPED ACRES
Residential	650	334
Industrial	646	144
Commercial	241	116
Public Facilities	174	N/A
Open Space	<u>35</u>	N/A
TOTAL	1,746	

- 1) Calculated from current zoning map. Includes roads and lands located in the 100 year flood zone
- 2) Based on information provided by the Mendocino County Tax Assessor's office

TABLE 3-3: LAND USE DENSITY AND BUILDING INTENSITY STANDARDS

LAND USE CATEGORY	MAXIMUM UNITS PER ACRE	MINIMUM LOT SIZE LOT (SQ.FT.)	MAXIMUM GROUND COVERAGE	MAXIMUM BUILDING HEIGHT
Residential Estate Single Family	2	20,000	40%	35 feet
Residential Medium-Density	7	6,000	40%	35 feet
Residential Multi-Family	14.5	6,000	50%	35 feet
Residential Office	29	6,000	60%	40 feet
	NA	5,000	Not Specified	45 feet
Commercial	NA	6,000	Not Specified	45 feet
Industrial (light)	NA	6,000	Not Specified	45 feet
Industrial Park	NA	20,000	50%	45 feet

improved utilization of the existing project area with the goal of generating additional employment opportunities. The east side "gateway" Specific Plan should be geared toward enhancing the existing downtown commercial area by attracting travelers off of the U.S. 101 bypass via Commercial Street. It may be desirable to incorporate an eastern "Gateway" into the Downtown Area Specific Plan, rather than engage in a separate planning process for this area.

3.300 Summary

By utilizing the existing land use designations shown on Exhibit 3-1, combined with future consideration of the proposed changes in land use on Exhibit 3-2, the City allows continuation of existing land uses while identifying lands whose designated use are likely to change at some point in the future. In this manner, the City is able to accommodate the concerns of existing property owners while acknowledging areas where future change is likely.

4.000 CIRCULATION NETWORK DESCRIPTION

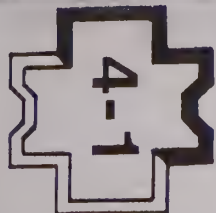
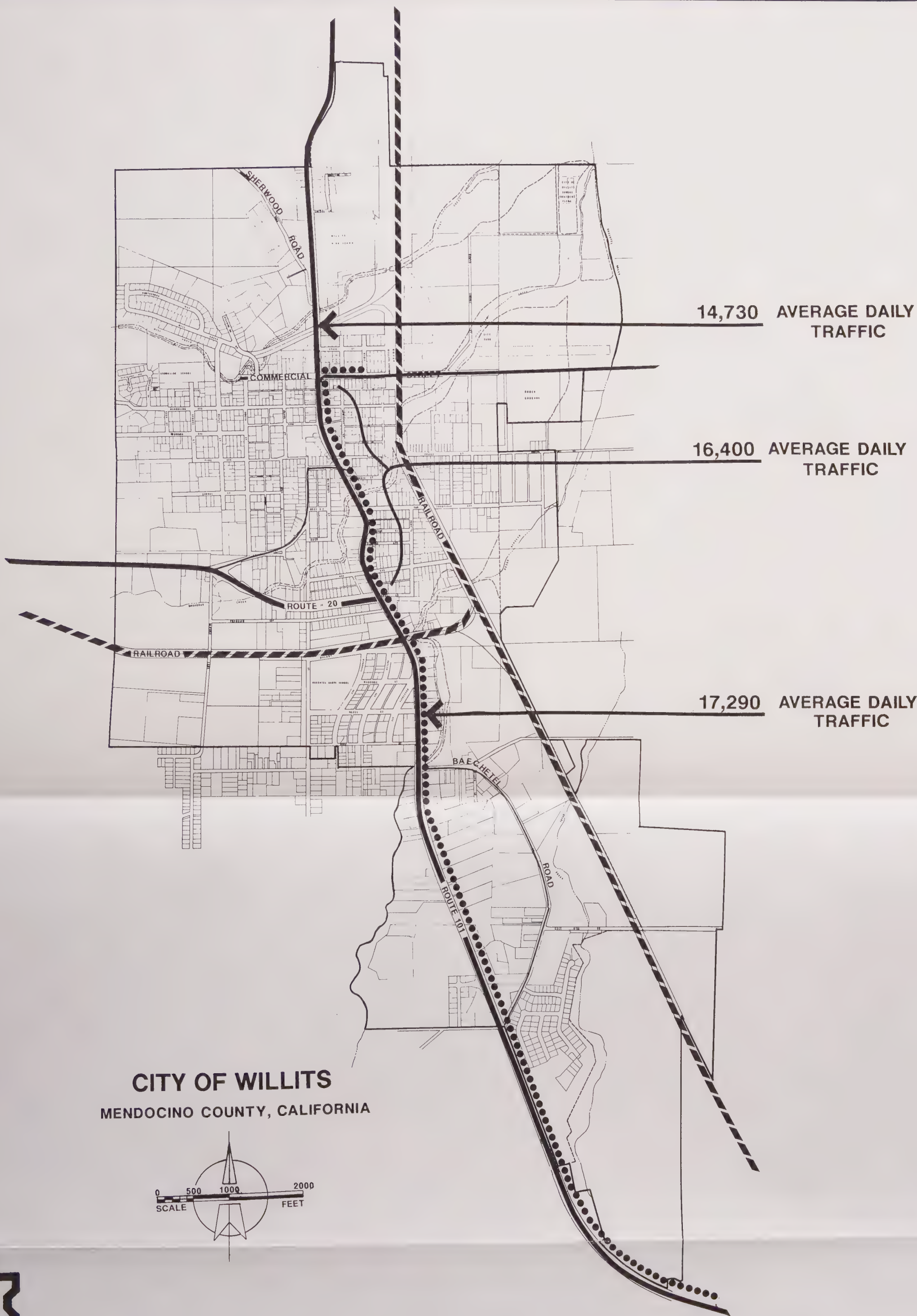
This appendix provides a description of the City's existing and projected future circulation network. The local circulation network consists of roadways, railroads, the airport and alternative modes of transportation such as bikeways and buses.

4.100 Roadways

Table 4-1 sets forth the classification of streets which is typically used by traffic engineers. Based on the definitions shown in Table 4-1, most of the roadways in Willits are classifiable as local streets or local collectors. Exceptions to this general tendency include Commercial Street and Sherwood Road, both of which fit the description of collectors; State Route 20, which serves locally as a minor arterial; and Main Street (U.S. 101), the City's primary arterial roadway. Exhibit 4-1 illustrates the location and classification of the main roadways in Willits. Existing traffic volumes are also shown on Exhibit 4-1.

TABLE 4-1: CATEGORIES OF STREETS

CATEGORY	DESCRIPTION	TYPICAL DAILY TRAFFIC
Freeway/Expressway	Limited access facility carrying regional traffic	Greater than 50,000 vehicles
Primary Arterial	Mainly serves through-traffic but also provides access to adjacent properties	25,000 - 50,000 vehicles
Minor Arterial	Serves through traffic, augments primary arterials, provides greater access to adjacent properties	10,000- 25,000 vehicles
Collector	Carries traffic within an area to arterials and also serves adjacent properties	2,500 - 12,000 vehicles
Local-Collector	Carries predominantly locally generated residential traffic to streets of a higher order, serves adjacent properties	1,000 - 3,000 vehicles
Local	Primarily serves adjacent properties	Less than 1,000 vehicles



LEGEND

- RAILROAD
- ARTERIALS
- COLLECTORS
- LOCAL COLLECTORS
- PUBLIC TRANSIT

WILLITS
GENERAL PLAN

EXISTING
CIRCULATION
NETWORK

In the future, the most significant development effecting the local roadway network will be the construction of the U.S. 101 bypass. This facility will divert through traffic (including most trucks) off of Main Street, resulting in lower noise levels and reduced vehicle emissions, and providing increased capacity to accommodate additional commercial and residential development. In addition to the bypass, growth in accordance with the Revised General Plan will result in changes in the classification of several roadways, based on expected increases in traffic volume. Exhibit 4-2 illustrates the likely configuration of the City's roadway network in 2020. Street standards are shown on Exhibit 4-3.

TABLE 4-2: ROADWAY NETWORK ALTERNATIVES

ALTERNATIVE	U.S. 101 BYPASS INTERCHANGE OPTION	BROOKTRAILS ACCESS
A	No bypass	Brooktrails Drive
B	No bypass	Commercial Street
C	No bypass	State Route 20
D	Bypass w/no interchange	Brooktrails Drive
E	Bypass w/no interchange	Commercial Street
F	Bypass w/no interchange	State Route 20
G	Interchange @ Commercial	Brooktrails Drive
H	Interchange @ Commercial	Commercial Street
I	Interchange @ Commercial	State Route 20
J	Interchange @ S.R. 20	Brooktrails Drive
K	Interchange @ S.R. 20	Commercial Street
L	Interchange @ S.R. 20	State Route 20

NOTE: See Brooktrails Access Study, TJKM, 1991 for description of access alternatives

Selection of the preferred roadway network shown on Exhibit 4-2 was based on analysis of twelve different circulation network alternatives. This analysis was conducted by TJKM Transportation Consultants and is available under separate cover. The twelve network alternatives (see Table 4-2) represent different combinations of Brooktrails access and U.S. 101 bypass options. Although decisions regarding selection of bypass and Brooktrails access alternatives are beyond the jurisdiction of the City, it is important that the City's preference with respect to these projects be officially stated. By achieving majority support for a specific circulation network alternative, the City will be in a better position to influence decision-makers in the selection process.

As a means of comparison, the twelve roadway network alternatives were ranked ordinally with regard to circulation, economic and environmental impacts. These rankings were derived by the General Plan consultant based on the aforementioned study performed by TJKM, environmental studies prepared in conjunction with the U.S. 101 bypass and Brooktrails access projects and the results of the economic analysis (Chapter 1). The rankings shown on Table 4-3 are among the criteria to be employed by the Council in selecting the preferred circulation network alternative.

TABLE 4-3: RANKING OF ROADWAY NETWORK ALTERNATIVES

ALTERNATIVE	ESTIMATED IMPACTS			AGGREGATE RANKING
	CIRCULATION	ECONOMIC	ENVIRONMENTAL	
A	12	7	10	29
B	10	8	12	30
C	11	9	11	31
D	9	10	1	20
E	8	11	3	22
F	7	12	2	21
G	6	2	5	13
H	5	1	6	12
I	4	3	4	11
J	2	4	7	13
K	3	5	9	17
L	1	6	8	15

Table 4-3 represents the General Plan consultant's ranking of each alternative from best (1) to worst (12) in terms of circulation, economic and environmental impacts. The aggregate ranking is based on an equal weighting of the three types of impacts. Thus, lower aggregate rankings are desirable to the extent that the City wishes to balance traffic, economic and environmental concerns.

The circulation ranking is based primarily upon impacts on levels of service and proposed mitigation measures at key signalized intersections along

Main Street as estimated by TJKM. The economic ranking is based on projected impacts on employment generation and downtown revitalization, the City's two main economic objectives. The environmental ranking was determined based on the combined effects of the various bypass and Brooktrails access options as estimated by the environmental studies prepared for these projects. Key factors considered in this regard included estimated impacts on sensitive resources (i.e., riparian corridors) and the amount of construction necessary to complete required network improvements.

Alternative I, is among the lowest scoring (and thus highest ranking) alternatives. Other highly ranked alternatives include G, J and L. The circulation network analysis contained in the Environmental Impact Report (Volume 3) is based on Alternative I. Under this scenario, U.S. 101 bypass, Alternative C, with an interchange at Commercial Street would be combined with a Brooktrails access road connecting to State Route 20. This alternative combines the economic advantages of an interchange leading into downtown Willits with the environmental benefits of using existing access roadways (Commercial Street) and minimal creek crossings associated with Brooktrails access. Determination of a preferred location for the bypass interchange leading into downtown will be made by the City at a later date, based on further consultation with Caltrans, Brooktrails Township and other affected parties.

4.200 Railroads

Willits is presently served by the Northwestern Pacific, Eureka Southern and the California Western Rail Lines. Freight rail service plays an integral role with respect to existing industries and is an important asset for attracting new industries to the community. Passenger rail service via the Skunk train offers a substantial source of tourism dollars. Local efforts are underway to ensure that existing freight rail service will be maintained, and that Skunk train service to Willits will be expanded in the future.

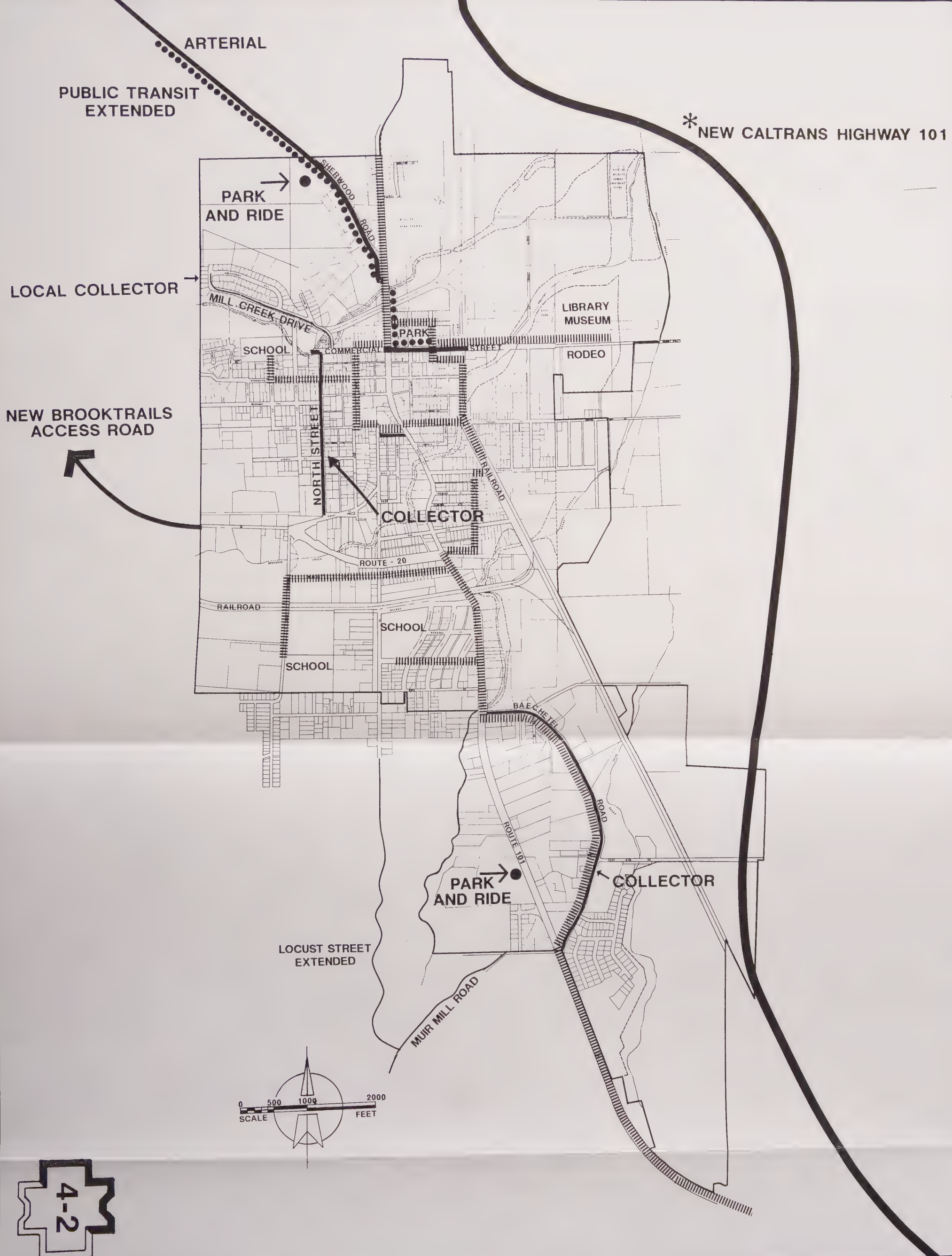
4.300 Willits Airport

The airport is a significant, if underutilized, component of the City's circulation network. Although the size of the facility is limited, some potential exists for airport expansion, particularly with respect to employment generating land uses such as repair facilities or machine shops. The City may wish to consider adoption of a Specific Plan for the Willits Airport.

4.400 Alternative Transportation Modes

Traffic reduction, improved air quality and reduced noise levels can be achieved through increased utilization of alternative transportation modes. The Mendocino Transit Authority bus line is the only alternative transportation facility shown on Exhibit 4-1. Exhibit 4-2, however, illustrates the City's intention to encourage alternative transportation utilization by designating a bikeway through the community and studying the feasibility of establishing bus service between Brooktrails and the Evergreen Shopping Center.

11-40



LEGEND

BIKE SAFETY ROUTE

PUBLIC TRANSIT EXTENTION

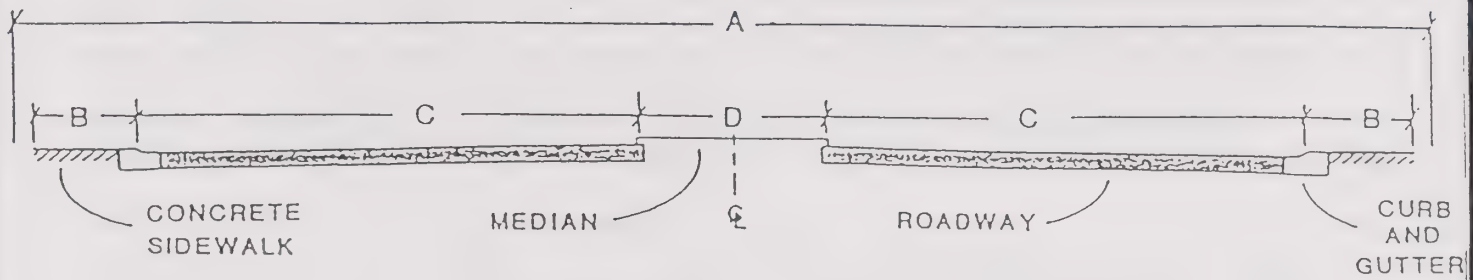
* THE PREFERRED LOCATION FOR THE BYPASS AND INTERCHANGE LEADING INTO DOWNTOWN WILL BE DETERMINED BY THE CITY AT A LATER DATE, BASED ON FURTHER CONSULTATION WITH CALTRANS, BROOK-TRAILS TOWNSHIP AND OTHER AFFECTED PARTIES.

MARTIN
CITY AND REGIONAL PLANNERS

CARPENTER
ASSOCIATES

**WILLITS
GENERAL PLAN**

**PREFERRED FUTURE
ROADWAY NETWORK**



Width of Segment in Feet

	A	B	C	D
	Right-of-Way	Curb, Gutter, and Sidewalk	Paved Roadway Per Direction	Median
Parkway	120	10	40	20
Arterial	106	10	36	14
Collector	76	10	28	--
Local	60	10	40	--



STREET CROSS SECTION STANDARDS

5.000 COMMUNITY NOISE ANALYSIS

5.100 Purpose

This study is intended to describe the existing and projected future noise environment in Willits so harmful and annoying sound levels can be avoided. Major noise sources are identified, noise levels throughout the community are recorded and the effects of noise on the community are discussed. Techniques for minimizing unwanted noise are outlined in the Environmental Impact Report (Volume 3).

5.200 Definition and Measurement of Noise

Noise is defined as 'unwanted sound' and is broadly recognized as a form of environmental degradation. Three qualities characterize the effect of noise on the listener:

1. The frequency of the noise.
2. The intensity of the noise.
3. The time-varying character of the noise.

Frequency is defined as the number of oscillations a particle undergoes in one second. Intensity is the measurement of the sound energy or pressure. The human ear is sensitive to a wide range of intensity. The range of sound pressure levels between the faintest audible sound and the loudest sound the ear can withstand is in the order of one to one billion. In order to conveniently handle this enormous range of numbers, a logarithmic scale has been established so the entire range is compressed to a range of from zero to 180. The sound pressure scale is expressed in decibels. Because the decibel scale is logarithmic, a small decibel change represents a large change in intensity. A doubling of the sound energy results in an increase of three decibels. The human ear, however, cannot usually perceive a three decibel change. It usually takes a change of about 10 decibels before a doubling of loudness is perceived.

The time-varying character of sound is particularly important to recognize. Noise levels throughout the community do not remain constant but rather fluctuate constantly both over time and in duration. Community noise consists of sources both distant and near to the listener. Distant sources may include traffic, wind and industrial activities. Nearby sources may include individual vehicles passing by, aircraft flying overhead and trains passing by.

Sound is measured by instruments which pick up sound in a microphone and convert sound vibrations to electric energy. In order to approximate the hearing response of the human ear, filters are placed in the sound level meter to de-emphasize low and high frequencies, thus emphasizing the normal range of human hearing. This weighting of noise measurement is called the A scale and measurements are referred to as dBA (A weighted decibel scale).

The A-weighted scale accurately describes environmental noise at any one particular time. However, community noise levels vary continuously, therefore all of the individual noise readings must be averaged over a 24 hour period to give an equivalent level. This concept, expressed as CNEL (Community Noise Equivalent Level) can then be used to indicate portions of the City with potentially harmful noise levels.

Table 5-1 shows typical sound levels generated by various common noise sources.

5.300 Noise Compatibility Standards

Over the years many studies have been performed to determine how much noise is acceptable for different land uses. The Environmental Protection Agency has given emphasis to levels deemed appropriate for residential land uses and has suggested the following:

1. For prevention of speech interference and annoyance in indoor residential areas: 45 dBA
2. For prevention of speech interference and annoyance in outdoor residential areas: 55 dBA

Beginning with these basic criteria, recent work by the California Department of Health, Office of Noise Control, has resulted in a compatibility chart which attempts to match each land use type with an appropriate range of noise levels (See Table 5-2). The land use compatibility chart used in conjunction with the noise exposure contours shown on the noise map provides a basis for decision making. Proposals for rezoning, for instance, can be evaluated for potential noise conflict without much difficulty. Mitigation measures can be imposed, when appropriate, as conditions of project approval.

5.310 Interpretation of the Land Use Compatibility Chart

5.311 Normally Acceptable. The range of noise levels in this category are compatible with the specified land use type. No special noise insulation is required in buildings of conventional construction.

5.312 Conditionally Acceptable. The range of noise levels in this category are higher than those normally acceptable for the specified land use type. A detailed acoustic study should be undertaken to set forth design features that will reduce exterior noise levels and/or for construction to control the amount of exterior noise reaching interior use spaces.

5.313 Normally Unacceptable. New construction or development of the specified land use type should be discouraged. If development is to pro-

TABLE 5-1: TYPICAL A-WEIGHTED SOUND LEVELS

<u>SOUND SOURCE</u>	<u>dB A READING</u>	<u>RESPONSE</u>
CARRIER DECK OPERATION	145 130	painfully loud limit amplified speech
JET TAKEOFF (listener at 200 feet)	120	
AUTO HORN (listener 3 feet) DISCO	115	maximum vocal effort
JET TAKEOFF (listener at 2000 feet) GARBAGE TRUCK	100	
NEW YORK SUBWAY STATION HEAVY TRUCK (listener 50 feet away)	90	very annoying loudness
ALARM CLOCK	80	annoying
FREIGHT TRAIN (listener 50 feet away) FREEWAY TRAFFIC (listener 50 feet away)	70	telephone use difficult
AIR CONDITIONING UNIT (listener 20 feet away)	60	intrusive noise levels
LIGHT AUTO TRAFFIC (listener 100 feet away)	50	quiet
RESIDENTIAL LIVING ROOM	40	
LIBRARY (soft whisper at 30 feet)	30	very quiet
BROADCASTING STUDIO	20 10 0	just audible threshold of hearing

[-----noises can cause hearing impairment-----]

TABLE 5-2
LAND USE COMPATIBILITY
FOR
COMMUNITY NOISE ENVIRONMENTS

LAND USE CATEGORY	COMMUNITY NOISE EXPOSURE LEVEL (CNEL)					
	55	60	65	70	75	80
<u>Residential</u> - Low Density, Single Family Homes, Duplex and Mobile Homes	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
<u>Residential</u> - Multi-family	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Motels and Hotels	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Schools, Libraries Churches Hospitals and Nursing Homes	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Sports Arenas, Outdoor Spectator Sports	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Playgrounds and Neighborhood Parks	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Golf Courses, Riding Stables, Water Recreation, Cemeteries	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Office Buildings	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable
Industrial, Manufacturing, Utilities and Agriculture	Normally Acceptable	Normally Acceptable	Conditionally Acceptable	Conditionally Acceptable	Normally Unacceptable	Unacceptable

INTERPRETATION



Normally
Acceptable



Conditionally
Acceptable



Normally
Unacceptable



Unacceptable

ceed, a detailed acoustic study must be prepared and needed noise insulation features incorporated into the design.

5.314 Unacceptable. New development of the specified land use type should not be undertaken when the site falls within the range of noise levels in this category.

5.320 Minimum Contents of Acoustical Reports

Site specific reports should contain a brief description of the project and the sensitivity of the land use type to noise, an accurate map describing the setting with surrounding uses and noise sources identified, and a quantitative description of the noise environment. For multi-story structures the report should discuss noise effects for the upper floors. Field noise sample measurements should be taken over several days and the average CNEL calculated should be based on daytime, evening and nighttime readings. If the project is located within the vicinity of a previously collected measurement, as shown on the noise map, a measurement should also be duplicated at that point for purposes of updating the map.

5.330 Qualifications for Preparing an Acoustical Report

Noise reports should be prepared by an acoustical engineer holding a degree in engineering, architecture, physics or allied discipline able to demonstrate a minimum of two years experience in the following areas of acoustics: transportation noise forecasting, building acoustics, field measurement of noise and noise mitigation.

5.400 Existing Noise Environment

Although Willits is a generally quiet community, its role as a sub-regional commercial and industrial center results in noise levels which are somewhat higher than those found in similar sized cities with lower levels of industry and commerce. Average measured noise levels range from 45 to 64 decibels; more significantly, readings in the 65-74 decibel range occur with some frequency, particularly at locations near U.S. 101.

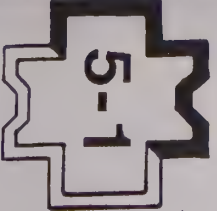
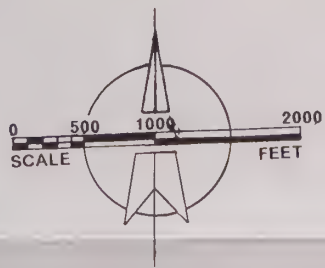
Exhibit 5-1 illustrates the results of field measurements taken at various locations throughout the City. This map also provides estimates of the 60 dBA noise contour along Main Street (U.S. 101). Exhibit 5-1, used in conjunction with Table 5-2, indicates which portions of the community are presently experiencing potentially harmful noise levels, as well as which types of land uses may require detailed acoustical analysis if proposed in certain parts of the City.

5.410 Field Measurements of Existing Noise Levels

Field measurements of noise were taken on the afternoon of July 15, 1991 and the morning of July 18, 1991. A Quest Model 215 sound level meter was



CITY OF WILLITS
MENDOCINO COUNTY, CALIFORNIA



60 dBA COUNTOUR
60 dBA CONTOUR

COMMUNITY
NOISE ENVIRONMENT

WILLITS
GENERAL PLAN

SEE TEXT FOR READINGS OF dBA LEVELS AT NUMBERED SITES

MARTIN - CARPENTER - ASSOCIATES
CITY AND REGIONAL PLANNERS

used. The meter was set on the DA scale and slow response setting. On both days weather conditions were good with clear skies and temperatures around 80 degrees Fahrenheit. Wind speed ranged from 5 to 15 miles per hour. Nine representative locations were chosen as indicated on Exhibit 5-1. Locations were selected to include noise sensitive land uses, such as parks, schools and hospitals, and uses in proximity to major noise sources, including U.S. 101 and the railroad tracks.

5.411 Location 1 - Recreation Grove Park. The average sound level was measured at 55 dBA. Ten percent of the time the measured noise level was 50 dBA or lower; ten percent of the time it was 63 dBA or higher. The higher readings were associated with passing vehicles and, on one occasion, train whistles.

5.412 Location 2 - Willits City Park. The average sound level was measured at 56 dBA. Ten percent of the time the measured noise level was 53 dBA or lower; ten percent of the time it was 64 dBA or higher. Children playing and passing autos were the main sources of noise at this location. Train noise is probably also significant at this location, although no trains appeared during the duration of the measurement period.

5.413 Location 3 - Brookside School. The average sound level was measured at 45 dBA. Ten percent of the time the measured noise level was 43 dBA or lower; ten percent of the time it was 50 dBA or higher. Children playing and a distant neighbor operating power tools were the most noticeable noise sources.

5.414 Location 4 - Willits High School. The average sound level was measured at 57 dBA. Ten percent of the time the measured noise level was 52 dBA or lower; ten percent of the time it was 66 dBA or higher. Passing trucks along U.S. 101 caused most of the readings above 65 dBA. The relative frequency of occurrences in the 60-70 decibel range at this location is a matter of concern, since schools are regarded as noise-sensitive land uses.

5.415 Location 5 - Baechtel Grove School. The average sound level was measured at 50 dBA. Ten percent of the time the measured noise level was 47 dBA or lower; ten percent of the time it was 52 dBA or higher. Children were the main source of noise readings in the upper range at this location.

5.416 Location 6 - Howard Memorial Hospital. The average sound level was measured at 56 dBA. Ten percent of the time the measured noise level was 52 dBA or lower; ten percent of the time it was 62 dBA or higher. As is the case with respect to Willits High School, the frequency of measurements above 60 dBA is a matter of concern, since hospitals are regarded as a noise sensitive land use.

5.417 Location 7 - Blosser Lane Elementary School. The average sound level was measured at 47 dBA. Ten percent of the time the measured noise level was 44 dBA or lower; ten percent of the time it was 54 dBA or higher. Passing cars and trucks coming to and from the adjacent industrial facility were the main sources of readings in the upper range.

5.418 Location 8 - U.S. 101 at State Route 20. The average sound level was measured at 64 dBA. Ten percent of the time the measured noise level was 60 dBA or lower; ten percent of the time it was 70 dBA or higher. Passing trucks and motorcycles were the main source of readings above 65 decibels. Because of the absence of noise-sensitive land uses at this location, existing noise levels are less problematical than those associated with sites 4 and 6.

5.419 Location 9 - Evergreen Shopping Center. The average sound level was measured at 62 dBA. Ten percent of the time the measured noise level was 55 dBA or lower; ten percent of the time it was 68 dBA or higher. Passing vehicles, construction activities and the car wash located across the street were the main noise sources at this location.

5.500 Anticipated Changes in the Noise Environment

In the future, there is a strong possibility of significant improvement in the noise environment of Willits. The proposed U.S. 101 bypass can be expected to have a beneficial effect by diverting through traffic off of Main Street. This will be especially effective with respect to truck traffic. Exhibit 5-1 illustrates the projected 2020 65 dBA noise contour, based on the assumption that an east side bypass will be completed by that time. Additional improvement in the community noise environment may result from the eventual closure of noise-generating industrial facilities, such as sawmills. While such events are clearly undesirable from an economic standpoint, their environmental benefits cannot be ignored. Finally, rail traffic is not expected to increase significantly over the planning period, making trains an unlikely source of future noise increases.

Of course, some increased noise generation can be expected to occur as a result of planned residential, commercial and industrial development. The nature and extent of these noise increases will depend upon the location and density of future approved development. Overall, however, the presence of potentially harmful noise levels, especially along the U.S. 101 corridor, which affects both Willits High School and Howard Memorial Hospital, should be reduced upon the completion of the bypass. In the interim period, interior noise levels should be measured at these locations and noise attenuation techniques such as those discussed in the Environmental Impact Report (Volume 3) should be considered if warranted by the measured sound levels.

6.000 INVENTORY OF BIOLOGICAL RESOURCES

The following tables list major vegetation and wildlife that have been observed in the Willits area, as well as certain species which are known to be associated with habitats similar to those found in Willits and the surrounding vicinity. The tables are based on the information contained in the 1983 General Plan, field observation and a records search conducted by the California Department of Fish and Game.

6.100 Coastal prairie grassland plant list.

Grasses

Bent Grass	<u>Agrostis oregonensis</u>
Silver Hairgrass	<u>Aira caryophyllea</u>
Slender Oat	<u>Avena barbata</u>
Little Quaking Grass	<u>Briza minor</u>
Dogtail	<u>Cynosurus echinatus</u>
Medusa Head	<u>Elymus caput-medusa</u>
Red Fescue	<u>Festuca rubra</u>
Velvet Grass	<u>Holcus lanatus</u>
Italian Ryegrass	<u>Lolium multiflorum</u>
Squirrel Tail	<u>Sitanion hansenii</u>

Herbs and Wildflowers

Dog Fennel	<u>Anthemis cotula</u>
Brodia	<u>Brodiaea conjesta</u>
Ithuriels Spear	<u>Brodiaea laxa</u>
Herald-of-Summer	<u>Clarkia amoena</u>
Hawksbeard	<u>Crepis vesicaria</u>
California Poppy	<u>Eschscholzia californica</u>
Klamath Weed	<u>Hypericum perforatum</u>
Blue Pod Lupine	<u>Lupinus polyphyllus</u>
Common Madia	<u>Madia elegans vernalis</u>
Pennyroyal	<u>Mentha pulegium</u>
Seep-spring Monkey Flower	<u>Mimulus guttatus</u>
English plantain	<u>Plantago lanceolata</u>
Jointed Charlock	<u>Raphanus raphanistrum</u>
Sheep Sorrel	<u>Rumex acetocella</u>
Hedge Nettle	<u>Stachys stricta</u>
California False Lupine	<u>Thermopsis macrophylla</u>
Tomcat Clover	<u>Trifolium tridentatum</u>

6.200 Mixed Evergreen Forest Plant List

Trees

Pacific Madrone	<u>Arbutus menziesii</u>
Ponderosa Pine	<u>Pinus ponderosa</u>
Douglas Fir	<u>Pseudotsuga menziesii</u>
Oregon White Oak	<u>Quercus garryana</u>
California Black Oak	<u>Quercus kelloggii</u>
Bay	<u>Umbellularia californica</u>
Coast Redwood	<u>Sequoia sempervirens</u>

Shrubs

Parry Manzanita	<u>Arctostaphylos manzanita</u>
Cascara Buckthorn	<u>Rhamnus purshiana</u>
Poison Oak	<u>Rhus diversiloba</u>
California Wild Rose	<u>Rosa californica</u>
Blackberry	<u>Rubus vitifolius</u>

Ground Cover *

Brome	<u>Bromus racemosus</u>
Bracken Fern	<u>Pteridium aquilinum</u>

* Ground cover consists of a continuation of the coastal prairie grassland with the addition of the two species listed.

6.300 Riparian Woodland Plant List

Trees

Big Leaf Maple	<u>Acer macrophyllum</u>
Pacific Madrone	<u>Arbutus menziesii</u>
Oregon Ash	<u>Fraxinus latifolia</u>
California Black Oak	<u>Quercus kelloggii</u>
Pacific Willow	<u>Salix lasiandra</u>

Shrubs

Brown Dogwood
Western Ninebark
Sierra Plum
Western Choke Cherry
Cascara Buckthorn
Blackberry
Blue Elderberry
Sitka Willow

Cornus glabrata
Physocarpus capitatus
Prunus subcordata
Prunus virginiana
Rhamnus purshiana
Rubus vitifolius
Sambucus ceruleus
Salix sitchensis

Ground Cover

Grasses

Orchardgrass
Rabbitfoot Grass

Dactylis glomerata
Polypogon monspeliensis

Herbs, Wildflowers and Other

Common Yarrow
Black Mustard
Monterey Centaury
Bull Thistle
Clarkia
Morning Glory
Umbrella Sedge
Queen Anne's Lace
Elegant Downingia
Common Horsetail
Klamath Weed
Everlasting Pea
Birdsfoot Lotus
Wood Rush
Curley Dock
White Lawn Clover
Broadleaf Cattail
Winter Vetch

Achillea millefolium
Brassica nigra
Centaurea muhlenbergii
Cirsium vulgare
Clarkia affinis
Convolvulus occidentalis
Cyperus alternifolius
Daucus carota
Downingia elegans
Equisetum arvense
Hypericum perforatum
Lathyrus latifolius
Lotus corniculatus
Luzula subsessilis
Rumex crispis
Trifolium repens
Typha latifolia
Vicia villosa

6.400 Wildlife commonly associated with habitats found in the vicinity of Willits

COMMON NAME	SPECIES NAME	RIPARIAN WOODLAND	MIXED EVERGREEN FOREST	COASTAL PRAIRIE GRASSLAND
AMPHIBIANS				
Pacific Giant Salamander	<u>Dicamptodon ensatus</u>		X	
Rough-skinned Newt	<u>Taricha granulosa</u>	X		
Oregon Salamander	<u>Ensatina eschscholtzi</u>	X	X	
California Slender Salamander	<u>Batrachoseps attenuatus</u>	X	X	
Arboreal Salamander	<u>Aneides lugubris</u>	X	X	
Black Salamander	<u>Aneides flavipunctatus</u>	X	X	
Western Toad	<u>Bufo boreas</u>	X	X	
Pacific Treefrog	<u>Hyla regilla</u>	X		
Redlegged Frog	<u>Rana aurora</u>	X		
Foothill Yellow-legged Frog	<u>Rana boylei</u>	X		
Bullfrog	<u>Rana catesbeiana</u>	X		
REPTILES				
Western Pond Turtle	<u>Clemmys marmorata</u>	X		
Western Fence Lizard	<u>Sceloporus occidentalis</u>	X	X	X
Southern Alligator Lizard	<u>Gerrhonotus multicarinatus</u>	X	X	X
Northern Alligator Lizard	<u>Gerrhonotus coeruleus</u>	X		
Rubber Boa	<u>Charina bottae</u>	X	X	X
Northwestern ringneck Snake	<u>Diadophis punctatus</u>	X		
Sharp-tailed Snake	<u>Contia tenuis</u>	X	X	X
California Striped Racer	<u>Masticophis lateralis</u>	X	X	
Western Yellow-bellied Racer	<u>Coluber constrictor</u>	X	X	X
Pacific Gopher Snake	<u>Pituophis melanoleucus</u>	X	X	X
Common King Snake	<u>Lampropeltis getulus</u>	X	X	X
California Red-sided Garter Snake	<u>Thamnophis sirtalis</u>	X		
Western Terrestrial Garter Snake	<u>Thamnophis elegans</u>	X	X	X
Aquatic Garter Snake	<u>Thamnophis couchi</u>	X		
Northern Pacific Rattlesnake	<u>Crotalis viridis</u>	X	X	X

COMMON NAME	SPECIES NAME	RIPARIAN WOODLAND	MIXED EVERGREEN FOREST	COASTAL PRAIRIE GRASSLAND
MAMMALS				
Opossum	<u>Didelphis marsupialis</u>	X	X	
Trowbridge Shrew	<u>Sorex trobridgei</u>	X	X	
Vagrant Shrew	<u>Sorex vagrans</u>	X		
Shrew Mole	<u>Neurotrichus gibbsi</u>	X		
Broad-handed Mole	<u>Scapanus latimanus</u>	X	X	X
Little brown Myotis	<u>Myotis lucifugus</u>	X	X	X
Fringed Myotis	<u>Myotis thysanodes</u>	X	X	?
Long-eared Myotis	<u>Myotis evotis</u>	X	X	?
California Myotis	<u>Myotis californicus</u>	X	X	X
Hairy-winged Myotis	<u>Myotis volans</u>	X	X	X
Silver-haired Bat	<u>Lasianycteris noctivagans</u>	X	X	X
Red Bat	<u>Lasiurus borealis</u>	X	X	?
Big brown Bat	<u>Eptesicus fuscus</u>	X	X	X
Hoary Bat	<u>Lasiurus cinereus</u>	X	X	?
Western big-eared Bat	<u>Plecotus townsendi</u>	X	X	X
Pallid Bat	<u>Antrozous pallidus</u>	X	X	X
Mexican freetail Bat	<u>Tadarida brasiliensis</u>	X	X	X
Raccoon	<u>Procyon lotor</u>	X		
Shorttail Weasel	<u>Mustela ermina</u>	X		
Longtail Weasel	<u>Mustela frenata</u>	X		
Mink	<u>Mustela vison</u>	X		
River Otter	<u>Lutra canadensis</u>	X		
Badger	<u>Taxidea taxus</u>			X
Spotted Skunk	<u>Spilogale putorius</u>	X	X	X
Striped Skunk	<u>Mephitis mephitis</u>	X	X	X
Western Skunk	<u>Eumeces skiltonianus</u>	X	X	X
Coyote	<u>Canis latrans</u>	X	X	X
Grey Fox	<u>Urocyon cinereoargenteus</u>	X	X	
Mountain Lion	<u>Felis concolor</u>	X	X	
Aplodontia	<u>Aplodontia rufa</u>	X		
California ground Squirrel	<u>Citellus beecheyi</u>			X
Sonoma Chipmunk	<u>Eutamias sonomae</u>	X	X	X
Western grey Squirrel	<u>Sciurus griseus</u>		X	
Valley Pocket Gopher	<u>Thomomys bottae</u>			X
Western harvest Mouse	<u>Reithrodontomys megalotis</u>			X
Deer Mouse	<u>Peromyscus maniculatus</u>		X	X
Dusky-footed Woodrat	<u>Neotoma fuscipes</u>		X	
California meadow Mouse	<u>Microtus californicus</u>	X		
Pacific jumping Mouse	<u>Zapus trinotatus</u>	X		
Blacktail Jackrabbit	<u>Lepus californicus</u>			X
Black-tailed Deer	<u>Odocoileus hemionus</u>	X	X	X

COMMON NAME	SPECIES NAME	RIPARIAN WOODLAND	MIXED EVERGREEN FOREST	COASTAL PRAIRIE GRASSLAND
BIRDS				
Turkey Vulture	<u>Cathartes aura</u>	X	X	X
White-tailed Kite	<u>Elanus leucurus</u>			X
Cooper's Hawk	<u>Accipiter cooperii</u>	X	X	X
Sharp-shinned Hawk	<u>Accipiter striatus</u>	X	X	X
Marsh Hawk	<u>Circus cyaneus</u>	X	X	X
Rough-legged Hawk	<u>Buteo lagopus</u>	X	X	X
Ferruginous Hawk	<u>Buteo regalis</u>	X	X	X
Red-tailed Hawk	<u>Buteo jamaicensis</u>	X	X	X
Red-shouldered Hawk	<u>Buteo lineatus</u>	X	X	X
Swainson's Hawk	<u>Buteo swainsoni</u>	X	X	X
Sparrow Hawk	<u>Falco sparverius</u>	X	X	X
California Quail	<u>Lophortyx californicus</u>	X	X	X
Common Egret	<u>Casmerodius albus</u>	X		
Great Blue Heron	<u>Ardea herodias</u>	X		
Green Heron	<u>Butorides virescens</u>	X		
Band-tailed Pigeon	<u>Columba fasciata</u>	X	X	
Mourning Dove	<u>Zenaidura macroura</u>		X	X
Screech Owl	<u>Otus asio</u>	X	X	X
Great Horned Owl	<u>Bubo virginianus</u>	X	X	X
Long-eared Owl	<u>Asio otus</u>	X	X	X
Barn Owl	<u>Tyto Alba</u>	X	X	X
Pygmy Owl	<u>Glaucidium gnoma</u>	X	X	X
Poor-will	<u>Phalaenoptilus nuttallii</u>	X	X	X
Common Nighthawk	<u>Chordeiles minor</u>	X	X	X
Lesser Nighthawk	<u>Chordeiles acutipennis</u>	X	X	X
Black Swift	<u>Cypseloides niger</u>	X	X	X
Vaux's Swift	<u>Chaetura vauxi</u>	X	X	X
Hummingbird	<u>Calypte anne</u>	X	X	X
Black-chinned				
Allen's Hummingbird	<u>Archilochus alexandri</u>	X	X	
Rufus Hummingbird	<u>Selasphorus rufus</u>	X	X	
Belted Kingfisher	<u>Megaceryle alcyon</u>	X		
Redshafted Flicker	<u>Colaptes cafer</u>	X	X	
Nuttal's Woodpecker	<u>Dendrocopus nutallii</u>	X	X	
Lewis' Woodpecker	<u>Asyndesmus lewis</u>	X	X	
Yellow-billed Sapsucker	<u>Sphyrapicus varius</u>	X	X	
Hairy Woodpecker	<u>Dendrocopos arizonae</u>	X	X	
Downy Woodpecker	<u>Dendrocopos pubescens</u>	X	X	
Acorn Woodpecker	<u>Melanerpes formicivorus</u>	X	X	
Western King Bird	<u>Tyrannus verticalis</u>	X		

COMMON NAME	SPECIES NAME	RIPARIAN WOODLAND	MIXED EVERGREEN FOREST	COASTAL PRAIRIE GRASSLAND
BIRDS (Contd.)				
Ash-throated Flycatcher	<u>Mviarchus cinerascens</u>	X	X	
Black Phoebe	<u>Sayornis nigricans</u>	X		
Traill's Flycatcher	<u>Empidonax traillii</u>	X	X	
Western Flycatcher	<u>Empidonax difficilis</u>	X		
Western Wood Pewee	<u>Contopus sordidulus</u>	X	X	
Horned Lark	<u>Kremophila alpestris</u>			X
Cliff Swallow	<u>Petrochelidon pyrrhonota</u>	X		X
Violet Green Swallow	<u>Tachycineta thalassina</u>	X	X	X
Tree Swallow	<u>Iridoprocne bicolor</u>	X	X	X
Bank Swallow	<u>Riparia riparia</u>	X		
Rough-winged Swallow	<u>Stelgidopteryx ruficollis</u>	X		
Purple Martin	<u>Progne subis</u>	X	X	X
Scrub Jay	<u>Aphelocoma coerulescens</u>	X	X	X
Common Crow	<u>Corvus brachyrhynchos</u>	X	X	X
Plain Titmouse	<u>Parus inornatus</u>	X	X	X
Common Bushtit	<u>Psaltiriparus minimus</u>	X	X	
White-Breasted Nuthatch	<u>Sitta carolinensis</u>	X	X	
Brown Creeper	<u>Certhia familiaris</u>	X		
House Wren	<u>Troglodytes aedon</u>	X		
Winter Wren	<u>Troglodytes troglodytes</u>	X		
Bewick's Wren	<u>Thryomanes bewickii</u>	X	X	
Mockingbird	<u>Mimus polyglottos</u>	X	X	X
Robin	<u>Turdus migratorius</u>	X	X	X
Western Bluebird	<u>Sialia mexicana</u>	X	X	X
Blue-gray Gnatcatcher	<u>Poliophtila caerulea</u>	X		
Cedar Waxwing	<u>Bombycilla cedrorum</u>	X	X	
Starling	<u>Sturnus vulgaris</u>	X	X	
Hutton's Vireo	<u>Vireo huttoni</u>	X	X	
Warbling Vireo	<u>Vireo gilvus</u>	X	X	
Orange-crowned Warbler	<u>Vermivora celata</u>		X	
Yellow Warbler	<u>Dendroica petechia</u>	X		
Audubon's Warbler	<u>Dendroica auduboni</u>	X		
Black-throated Gray Warbler	<u>Dendroica nigrescens</u>		X	
Yellow throat	<u>Geothlypis trichas</u>	X		X
Wilson's Warbler	<u>Wilsonia pusilla</u>	X		
Western Meadowlark	<u>Sturnella neglecta</u>	X	X	X
Brewer's Blackbird	<u>Euphagus cyanocephalus</u>	X	X	X
Black-headed Grosbeak	<u>Pheucticus melanocephalus</u>		X	
Lazuli Bunting	<u>Passerina amoena</u>	X	X	

COMMON NAME	SPECIES NAME	RIPARIAN WOODLAND	MIXED EVERGREEN FOREST	COASTAL PRAIRIE GRASSLAND
Purple Finch	<u>Carpodacus purpureus</u>	X	X	
American Goldfinch	<u>Spinus tristis</u>			X
Rufous-sided Towhee	<u>Pipilo erythrophthalmus</u>	X		
Brown Towhee	<u>Pipilo fuscus</u>	X		
Grasshopper Sparrow	<u>Ammodramus savannarum</u>			X
Vesper Sparrow	<u>Poocetes gramineus</u>			X
Lark Sparrow	<u>Chondestes grammacus</u>			X
Oregon Junco	<u>Junco oreganus</u>	X	X	X
White-crowned Sparrow	<u>Zonotrichia leucophrys</u>	X	X	X
Lincoln's Sparrow	<u>Melospiza lincolnii</u>	X		
Song Sparrow	<u>Melospiza melodia</u>	X		

FISH

Chinook Salmon	<u>Oncorhynchus tshawytscha</u>	X
Poach	<u>Hesperoleucus symmetricus</u>	X
Steelhead	<u>Salmo gairdneri</u>	X
Western Sucker	<u>Catostomus occidentalis</u>	X

6.500 Rare, Endangered or Sensitive Plants Not Listed in Natural Diversity Data Base (NDDb)

There are five species of vascular plants within the Willits area that have not been listed by the California Department of Fish and Game as rare, but have been recommended to the U.S. Congress by the Smithsonian Institute as being endangered or threatened.

1. Hoover's Semaphore Grass - This species is listed by the state as rare and by the Smithsonian Institute as endangered and occurs in meadows and in mixed evergreen forest.
2. Glandular Dwarf Flax - This species is listed by the Smithsonian Institute as endangered and occurs at 1,500 to 4,500 feet on dry brush hills and woods, at least partly on serpentine soil.
3. Showy Indian Clover - This species is listed by the Smithsonian Institute as endangered and grows in low rich fields and swales.
4. Douglas Pogogyne - This species is listed by the Smithsonian Institute as endangered and grows in the dry bottoms of shallow winter pools.

5. Pityopus - This species is listed by the Smithsonian Institute as threatened and occurs within deeply shaded areas in mixed evergreen forest.

6.600 Species and Habitats Listed by NDDB

1. Baker's Meadowfoam - This plant is federally and state listed as rare and has been observed along the east side of U.S. 101, roughly one mile north of Willits High School.
2. Valley Oak Woodland - NDDB notes the presence of Valley Oak Woodland throughout a substantial portion of Little Lake Valley. While neither federally or state listed as rare or endangered, Valley Oak Woodland is regarded as a habitat of concern by the Department of Fish and Game.

7.000 HOUSING NEEDS ASSESSMENT

7.100 Introduction

This appendix contains an analysis of local housing needs, evaluation of existing housing policies and quantitative housing production targets for 1990-1997. Housing Element goals, policies and programs based on this needs assessment are contained in Volume 1, Chapter 5 of the Revised General Plan.

7.110 Definition of Income Categories

Since this assessment of local housing needs is discussed in terms of income categories, it is important to define these income categories at the outset. Most federal, state and local agencies categorize households based on a proportion of an area's median family income, as summarized below:

<u>INCOME CATEGORY</u>	<u>% AREA MEDIAN INCOME</u>
Very Low	Below 50%
Low	50-80%
Moderate	80-120%
Above Moderate	120%

Table 7-1 provides an estimate of the number of Willits residents who fall into each of the above income categories, along with the estimated maximum monthly housing payment for each income group.

7.120 Information Sources

Income data and information pertaining to household and housing unit characteristics were derived from the 1990 U.S. Census and from estimates obtained from the California Department of Finance. Housing needs estimates were provided by the Community Development Commission of Mendocino County. Existing data sources were augmented by original research, including a windshield survey of housing conditions, interviews with human service providers, bankers and real estate professionals, and a review of local building permit records.

7.130 Efforts to Achieve Public Participation

Numerous mechanisms were employed in an effort to achieve broadbased citizen participation in the Housing Element Update process. First, a questionnaire pertaining to the General Plan revision was distributed to

TABLE 7-1: ESTIMATED INCOME AND HOUSING AFFORDABILITY

INCOME CATEGORY	HOUSEHOLDS IN INCOME CATEGORY ¹		1990 HOUSEHOLD INCOME ²		MAXIMUM MONTHLY ³ HOUSING PAYMENT
	NUMBER	PERCENTAGE	ANNUAL	MONTHLY	
Very Low	571	30	\$12,000	\$1,000	\$333
Low	248	13	19,200	1,600	480
Moderate	419	22	28,800	2,400	720
Above Moderate	667	35	28,800+	2,400+	720+

1. Income distribution based on estimate provided by Community Development Commission of Mendocino County.
2. Household income estimate based on extrapolation of 1980-89 per capita income growth rate estimated by the Department of Finance.
3. Maximum payment calculated on the basis of the generally accepted standard of 30% of monthly income.

all Willits residents. More than 400 responses to this survey were received, 80 of which cited housing affordability as one of the three most important local concerns. More than 60% of the survey respondents agreed with the statement that "more affordable housing is needed in Willits". The resident survey was followed by a series of broadly noticed public workshops, one of which was devoted exclusively to housing and land use matters. In addition to the mail survey and public workshops, interviews were conducted with human service providers, including the directors of the local food bank, senior center and homeless advocacy groups. Preliminary drafts of the Housing Element Update were reviewed by the General Plan Revision Steering Committee, a group of citizens appointed by the City Council. Ultimately, additional public comment will be received at the City Council hearings on the Revised General Plan. Through all of these methods, a broad range of citizen input has been received and incorporated into the Housing Element Update process.

7.140 Relation to Other Elements

There is a close interrelationship between the Housing Element and other elements of the Willits General Plan. The Land Use Element, for example, must designate sufficient sites to accommodate the number of additional dwelling units called for by the Housing Element. The Conservation and

Open Space Element identifies environmental constraints which must be accommodated in the development of future housing projects. Perhaps most importantly, the employment development policies contained in the Economic Development Element are essential as a means of raising household incomes, thereby enhancing local housing affordability.

Consistency between the various General Plan elements has been achieved by revising all elements concurrently rather than conducting the Housing Element revision in piecemeal fashion, as has been the case in many California municipalities. In this manner, land use designations, housing production targets, environmental preservation efforts and employment development strategies can be coordinated toward the achievement of agreed upon goals and objectives.

7.150 Information Sources for Housing Element

Base data for the housing needs assessment were derived from a variety of sources, including the 1990 U.S. Census, Department of Finance projections and the Community Development Commission of Mendocino County. Information pertaining to existing housing conditions and sites suitable for residential development was obtained through field observation. Data concerning current home prices, financing and rental rates were generated by conducting interviews with local Realtors and members of the banking community. Finally, information regarding the homeless and other special needs groups was provided by local human service providers.

7.200 Assessment of Housing Needs

7.210 Population and Household Characteristics

The 1990 Census estimated the total population of Willits to be 5,027 residents. This represents an increase of roughly 25 percent over the 1980 population of 4,008. Based on the preferred growth scenario contained in the revised General Plan (which in turn is based on Department of Finance projections for Mendocino County), Willits is expected to have a population of about 7,500 by 2020.

Nearly 14 percent of the population is 65 years of age or older according to the 1990 Census, up from 12.7 percent in 1980. This aging of the population, while slight during the 1980's, is expected to accelerate in the future. The Department of Finance estimates that between 1990 and 2020, the number of persons in Mendocino County age 65 and older will increase more than twice as fast as the population as a whole.

Nearly 90 percent of the residents of Willits are white, with "other races" and Native Americans comprising the City's largest nonwhite groups. The proportion of white residents has declined slightly from 92.9 percent in 1980. About half of this decline can be explained by increases in the Native American population which rose from 91 in 1980 to 168 in 1990, an 85 percent increase.

The City's estimated median household income was \$24,000 in 1990, representing an increase of 61.2 percent over 1980. This compares with an increase in the northern California consumer price index of 51.5 percent over the same time period, indicating that local incomes increased only slightly on average during the decade after taking inflation into consideration. The slow growth of household incomes during the 1980's can be attributed, in part, to local job losses and, to a lesser extent, a recent influx of AFDC recipients, presumably migrating from areas with higher living costs. The number of AFDC cases in the Willits zip code area increased by 59 percent between 1980 and 1990, a growth rate which cannot be entirely explained by local job losses.

7.220 Characteristics of the Housing Stock

In 1990, 1,968 housing units were estimated in Willits by the Census Bureau. This compares with 1,595 units in 1980; an increase of 23 percent. The fact that population increased faster than housing during the 1980's is reflected in the City's vacancy rate, which declined from 6.9 percent in 1980 to 3.3 percent in 1990. While the average number of persons per occupied dwelling unit remained virtually constant from 1980 (2.63) to 1990 (2.61), the proportion of overcrowded units increased from 4.7 percent to 7.2 percent over this time period. Both the lower vacancy rate and the higher proportion of overcrowded units are indicative of a tightening of the local housing market over the past decade.

The Willits zip code area has 92 Section 8 units, some of which may be subject to expiration of their subsidies over the next five years, and some of which are located outside of the City limits. Within the City, the Holly Heights and Baechtel Creek projects comprise over three-fourths of all subsidized housing units. Neither of these projects are in danger of losing their subsidies by 1997 or any time thereafter, according to interviews with project administrators conducted in October, 1991. However, the statewide Inventory of Federally Subsidized Low-Income Rental Units at Risk of Conversion lists 26 elderly Section 8 units as being subject to expiration as early as August, 1993. This same inventory notes that at least five years of additional subsidy are available for this project beyond the earliest possible termination date. Thus, neither the Holly Heights project nor the Baechtel Creek senior housing appear to be in jeopardy of losing their subsidies within the five-year planning period. The City shall continue to monitor local Section 8 units so that the City's local quantified objectives and the programs designed to reach them can be expanded in the event that these units are deleted from the affordable housing stock. There are no locally-subsidized units at-risk, as the City has not issued mortgage revenue bonds, has not approved any density bonuses with financial assistance, does not have an in-lieu fee program, and has not assisted multi-family housing with redevelopment or CDBG funds.

Willits has a relatively low proportion of home ownership, with only 48 percent of the City's occupied units owned by the occupant in 1990. Significantly, the proportion of owner-occupancy has sharply declined, from 59 percent in 1980. Although this decline is largely the result of the high proportion of multi-family dwellings built during the decade, the rapid decline in home ownership can be at least partly attributed to an increase in income inadequacy on the part of Willits residents.

The median value of owner-occupied homes in Willits was \$82,600 in 1990, representing a sharp increase from the \$65,000 reported in the 1983 Housing Element. Median contract rent in 1990 was \$370, up from \$275 in 1983. According to interviews conducted with local real estate professionals in September, 1991, prevailing sales prices for single family homes range from \$85,000 to \$135,000 and current monthly rents range from \$300 to \$700. Increases in rents and home prices during the previous decade have combined with income and supply inadequacies to create a serious current housing affordability problem in Willits. This problem can be addressed by increasing the supply of affordable dwelling units and by facilitating the creation of jobs which enhance the ability of residents to pay for housing.

A windshield survey of housing conditions was conducted in July 1991. Based on this survey, it is estimated that 9 percent of the City's housing units (177 dwellings) are in need of substantial rehabilitation and 5 percent (98 units) are in need of replacement. Proportionately, this estimate is similar to the number contained in the 1983 Housing Element. Locationally, homes in need of rehabilitation tend to be more prevalent in the central portion of the City between Main Street and the Northwestern Pacific railroad tracks. Between 1980 and 1990, a total of 51 permits for home improvements in excess of \$10,000 were approved, suggestive of a low rate of home rehabilitation.

7.300 Correlation of Incomes and Housing Costs

The income and housing cost estimates presented in the previous section suggest that Willits has a growing housing affordability problem. The magnitude of the problem is illustrated by Table 7-1 which estimates that all of the City's very low-income households and many of its low-income households were unable to afford the \$370 median contract rent in 1990. Based on Table 7-1, it is estimated that up to 500 very low- and low-income households in Willits were overpaying for housing in 1990, representing more than one-fourth of the City's total households.

Table 7-1 also illustrates that the maximum monthly housing costs for moderate-income households in Willits is less than the required monthly payment for purchasing a home priced at the City's average home value (\$82,600). This suggests that home purchases are becoming increasingly out of reach for moderate-income Willits residents, a finding which appears to be confirmed by the aforementioned decline in home-ownership between 1980 and 1990.

In summary, housing affordability for both renters and home buyers has declined substantially in Willits over the last decade. Causal factors include declining household incomes resulting from local job losses and an influx of low-income residents, inadequate housing production, rapid increases in rents and home prices and a slow rate of housing rehabilitation. Policies contained in the Housing Element Update are intended to address this growing affordability problem by facilitating the provision of housing for all income groups.

7.400 Local Quantified Housing Objectives

Article 10.6, Section 65588 of the Government Code, charges regional councils of government with determining each locality's share of regional housing need. The Community Development Commission of Mendocino County has estimated Willits share of housing need for 1990-1997 as follows:

<u>INCOME CATEGORY</u>	<u>ESTIMATED NEED 1990-1997</u>	<u>% OF TOTAL NEED</u>
Very Low	68	30
Low	29	13
Moderate	50	22
Above Moderate	<u>78</u>	<u>35</u>
TOTAL HOUSING NEED	225	100

Policy 5.250 of the Housing Element (Volume 1) identifies the above targets as the City's local quantified housing objectives. These objectives are consistent with the local growth rate envisioned under the preferred General Plan alternative. Policies and programs contained in the Housing Element are designed to enhance the likelihood of the local housing objectives being met. Exhibit 7-1, the Inventory of Sites Suitable for Residential Development, illustrates that sufficient sites are currently available to meet the City's share of projected regional housing need.

7.500 Analysis of Special Needs Groups

Because of circumstances which may adversely affect their ability to obtain housing, certain groups of residents are regarded as special needs groups. These groups tend to include large families, female-headed households, elderly, disabled, farm workers and homeless persons. In Willits, displaced industrial workers are an additional group which may be in need of special emphasis. Table 7-2 provides quantitative estimates of these

groups based on 1990 Census data, extrapolation of 1980 Census data, statistics from the Employment Development Department and interviews with local human service professionals.

TABLE 7-2: SPECIAL NEEDS GROUPS

GROUP	# HOUSEHOLDS/PERSONS	% OF TOTAL
Large Families (5 or more)	204	10.7
Households with elderly member	531	27.8
Female-headed households with children	211	11.1
Persons with disabilities	310	6.2
Homeless persons	23	0.4
Farm workers	NA	NA
Displaced workers	NA	NA

7.510 Large Families

Roughly one in nine Willits households had five or more members in 1990. Although the City's proportion of large families remained constant from 1980 to 1990, the number of large households in Willits increased from 160 to 204. Over this same time period, the proportion of overcrowded units in the City increased from 4.7 percent to 7.4 percent. These data suggest that large households constitute a significant special housing needs group in Willits. The Housing Element contains several policies (5.240, 5.260, 5.270) and implementation measures (5.320, 5.360) which address the special housing needs of this group.

7.520 Elderly

Table 7-2 indicates that more than one-fourth of the households in Willits have at least one member 65 years of age or older. Housing needs of the elderly are related to their decreased mobility and smaller living space requirements. In addition, housing for elderly residents should be located in close proximity to medical, commercial and recreational facilities.

In recent years, a number of specialized housing projects for seniors have been developed in Willits. Demand for such facilities is likely to increase in the future, given the rapid projected growth rate of the City's

elderly population. The private market thus far has been an effective provider of senior housing. The City's main role, therefore, centers around the prevention of discrimination (Policy 5.270; implementation measure 5.320) and the encouragement of nonprofit home-sharing programs (implementation measure 5.360).

7.530 Female-headed Households with Children

Approximately one out of every nine households in Willits can be categorized as female-headed households with children. The special housing needs of this group include low-cost housing suitable for children and located near schools and child care facilities. Home-sharing arrangements which include congregate cooking and child care may also be desirable. Policies contained in the Housing Element which affect this group include those intended to prevent discriminatory housing practices (5.270) and to promote housing affordability (5.220, 5.250).

7.540 Persons with Disabilities

The 1980 Census estimated the number of persons with work disabilities in Willits at 248. Applying this figure to the City's 1980-1990 growth rate results in an estimate of 310 for 1990. Although not all persons with work disabilities require special housing, many need specially designed units, located near transportation, shopping and services. Policies 5.220 and 5.270 and implementation measures 5.320 and 5.360 address the housing needs of this component of the population.

7.550 Homeless Persons

The 1990 Census identified 23 persons residing in homeless shelters in Willits. Since the City contains no shelter facilities, it is assumed that this figure represents the number of participants served by the Willits Community Services voucher program in a given time period. In addition to homeless residents, the number of persons "at risk" of becoming homeless is a significant policy matter. During the first 10 months of 1991, 110 people were served by Willits Community Services' emergency shelter voucher program, 16 of whom were classifiable as nonresidents. Based upon these statistics and interviews with human service providers, between 75 and 125 Willits residents have either experienced an episode of homelessness in the past 12 months or can be considered to be in the "at risk" category. Policy 5.230 and implementation measures 5.370 and 5.380 are directly intended to meet the needs of the City's homeless and "at risk" residents.

7.560 Farm Workers

Because of the manner in which employment statistics are categorized, it is impossible to determine the precise number of farm worker families in Willits. Given the lack of farming in the planning area, combined with

the commercial and industrial nature of the City itself, it is highly unlikely that a substantial enough number of farm workers exists in the City to warrant their inclusion as a special needs group.

7.570 Displaced Industrial Workers

The transformation of the local work force analyzed in detail in Chapter 1 of this volume has adversely affected the ability of displaced industrial workers to afford housing in Willits. While it is impossible to accurately determine the precise number of workers affected, it is certain that some degree of increased unemployment and underemployment has occurred as a result of the City's shift from a manufacturing to a retail and service-based economy. The July 1990 unemployment rate for Mendocino County (9.7 percent) is but one indication of area-wide job shortages which reduce the ability of residents to pay for housing. All of the Housing Element policies and programs designed to promote housing affordability are likely to be of benefit to this group. More importantly, policies contained in the land use and economic development elements which are geared toward attracting well-paying employment can be expected to increase the ability of local workers to pay for housing.

7.600 Constraints to Housing Development

This section addresses both market and nonmarket factors which act to constrain the availability of housing in Willits. Policies designed to alleviate some of the constraints discussed below are contained in Volume 1, Chapter 5.

7.610 Market Constraints

Recent increases in housing prices, combined with stagnant household incomes, have had an adverse impact on housing affordability in Willits. Between 1980 and 1990, the median value of owner-occupied housing units increased by 27 percent. Over this same time period, the proportion of Willits residents who own their own homes declined by 19 percent. Construction costs have increased by 25-40 percent over the same time period and land values have increased by an even larger amount. According to local builders, construction costs average between \$65 and \$80 per square foot; residential lots, where available, cost between \$40,000 and \$60,000. More significantly, a change in the distribution of incomes within Willits appears to have occurred, with an increased proportion of residents falling into the low-income component of the population. Factors which have contributed to this phenomenon include the City's increasing percentage of retired residents, industrial plant layoffs and an apparent influx of AFDC recipients from other jurisdictions. All of these variables are largely beyond the control of the City; yet their impact must be addressed by General Plan goals and policies.

Financing availability appears to be less of a problem than income inadequacy in Willits. Locally, mortgage interest rates declined by approximately 20 percent between 1989 and 1992, to a present level of roughly 8.5 percent. Moreover, local bankers indicate that there do not appear to be any mortgage deficient areas within the community.

Because the City's housing affordability problems are largely economic in nature, policies contained in the Economic Development Element must be considered in addition to the City's Housing Element goals, policies and programs. Simply put, the City's objective is to increase household incomes by promoting employment opportunities through industrial development and downtown revitalization. In this manner, the City seeks to enhance housing affordability. To a large extent the effectiveness of the City's Housing Element policies and programs will depend upon its success at overcoming the constraints posed by inadequate household incomes.

7.620 Nonmarket Constraints

Although the market factors discussed above are largely responsible for the City's current housing affordability dilemma, numerous nonmarket constraints have also played a contributing role. Nonmarket constraints include factors such as reductions in federal and state support for housing programs, planning and building permit fees and zoning restrictions which preclude the development of affordable housing.

With regard to federal and state transfer payments, both the immediate and long-term prognosis for future increases is not favorable. The City's housing programs must, therefore, be predicated on the notion of no likely increases in support from such sources.

Planning, building and other fees associated with residential construction in Willits are summarized by Table 7-3. In general, fees charged by the City are substantially lower than those found in many other similarly sized jurisdictions and do not, therefore, constitute significant constraints to housing development.

Local planning and zoning conditions which act to constrain affordable housing availability include public hearing requirements for second dwelling units and small lot sizes on property zoned for commercial use which might otherwise be suitable for multi-family housing. These constraints are addressed by programs 5.330 and 5.331 respectively (see Volume 1).

7.700 Evaluation of Existing Housing Programs

Although the 1985 Housing Element contains several housing programs, the lack of quantified objectives makes it difficult to fully evaluate the results. Overall, the element identified a need for 782 new homes from 1980 to 1990. Since 373 units were actually built during this time period, the City can be said to have attained nearly 50 percent of its

estimated housing need for the decade. In terms of affordability, however, the fact that fully two-thirds of the homes built in the City during the decade (253 of 373 units) were multi-family dwellings indicates that the City met or exceeded its objectives regarding the percentage of units affordable to low- or moderate-income households. This conclusion is also supported by the inclusion of 76 subsidized dwellings among the City's 1980-90 housing production totals, all of which are priced at rents affordable to very low-income households.

TABLE 7-3: FEES ASSOCIATED WITH RESIDENTIAL DEVELOPMENT

FEE	AMOUNT
General Plan Amendment	\$ 500.00
Zoning Change/Text Amendment	400.00
Variance	160.00
Lot Line Adjustment	150.00
Minor Site Plan Review	125.00
Major Site Plan Review	250.00
Subdivision	750.00 + \$50 per parcel
Water Service Connection Fee	1,500.00 single family, 1,000.00 multi-family
Sewer Connection Fee	1,500.00
School Fees	1.58/sq. ft.
Building Permit Fees (@ \$100,000 valuation)	1,055.00

Specific programs contained in the 1985 Housing Element include density bonuses, encouragement of second dwelling units and prohibitions on mobile home park conversion. The density bonus program was utilized in approving the recently completed 60 unit senior housing complex in the southeast portion of the City. Program 5.350 of Volume 1 contains wording to bring the City's density bonus program into compliance with recently revised state law. Encouragement of second dwelling units has been less successful, in part because of the public hearing requirement. To date, only one such dwelling has been approved. Elimination of the public hearing re-

quirement should have the effect of increasing the number of second dwelling unit applications. The City's policy of restricting conversion of mobile home parks has been reconsidered in light of the dilapidated condition of several existing parks, combined with the availability of sites suitable for new mobile home park development.

7.800 1990-95 Housing Programs

In addition to the refinements in existing programs discussed above, the Housing Element Update contains a number of new housing programs. Fee waivers, outreach to nonprofit organizations and establishment of funding sources for homeless programs are among the new approaches included in the Housing Element Update. Also essential to the City's housing development strategy is a commitment to encouraging multi-family and mixed commercial/-residential development in the revitalized downtown area. Finally, policies contained in the Economic Development Element geared toward employment generation will promote housing affordability by putting more income in the hands of local residents, enabling them to better afford market rate housing. Table 7-4 summarizes the City's quantified housing objectives in relation to the programs designed to achieve them.

TABLE 7-4: 1990-97 HOUSING PRODUCTION OBJECTIVES

INCOME GROUP	1990-97 OBJECTIVE	SINGLE FAMILY	MULTI-FAMILY ¹	MOBILE ² HOMES	SECOND DWELLINGS
Very Low	68	0	30	30	8
Low	29	0	20	8	1
Moderate	50	20	20	10	
Above Moderate	<u>78</u>	<u>78</u>	<u>0</u>	<u>0</u>	<u>0</u>
TOTALS	225	98	70	48	9

1. Includes 40 units derived by encouraging mixed-use and multi-family development on commercially zoned property and 30 units derived through density bonus programs.
2. Includes 30 density bonus units associated with development of a 30 acre site located in the northern portion of the City (see Exhibit 7-1).

7.900 Sites Suitable for Residential Development

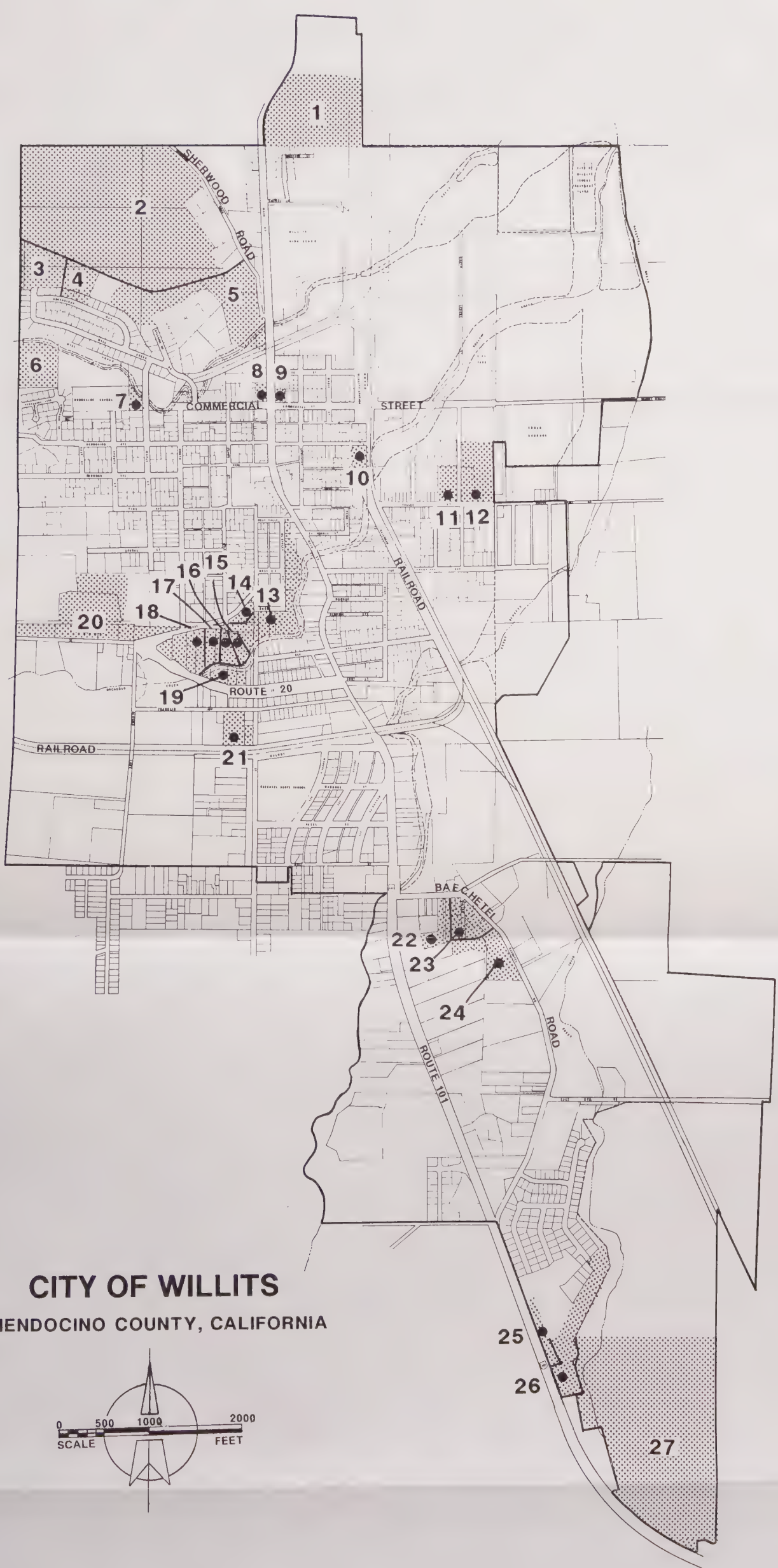
Exhibit 7-1 identifies various sites throughout the City which are considered to be suitable for residential development. Table 7-5 provides an enumeration of these sites, along with an assessment of their development capability. Under existing zoning, a maximum total of 1,631 dwelling units could be built, including 1,208 multi-family units. This greatly exceeds the City's share of regional housing needs, which has been estimated at 225 units. Thus, even without changes in zoning, the City of Willits has more than enough sites to meet its quantified housing objectives. Based on the City's recent housing production totals, it is highly likely that the objectives identified in the previous section can be met within the 1990-1997 planning period.

SITES SUITABLE FOR
RESIDENTIAL
DEVELOPMENT

WILLITS
GENERAL PLAN

SEE TEXT AND TABLE 7-5 THE FOR THE ESTIMATED
NUMBER OF UNITS POSSIBLE FOR EACH SITE

MARTIN • CARPENTER • ASSOCIATES
CITY AND REGIONAL PLANNERS



CITY OF WILLITS
MENDOCINO COUNTY, CALIFORNIA

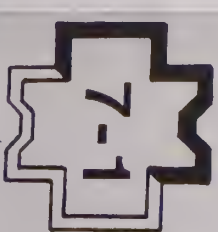
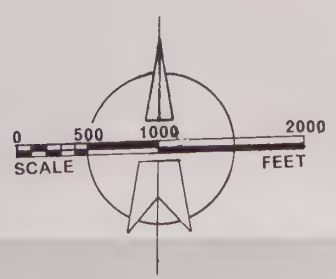


TABLE 7-5: SITES SUITABLE FOR RESIDENTIAL DEVELOPMENT

SITE NO.	LOCATION	EXISTING ZONING	SINGLE FAMILY MULTI-FAMILY	MAXIMUM NUMBER ADDITIONAL UNITS	CONSTRAINTS RATING *
1	North Main	C1	MF	435	A
2	Sherwood Road	R1-B-L	SF	63	B
3	Northbrook Way	R1-B-L	SF	30	B
4	Northbrook Way	R1-B-L	SF	25	B
5	Sherwood Road	R1-B-L	SF	3	A
6	Hawthorne Lane	R1	SF	34	A
7	Maple Street	R1	SF	7	B
8	Commercial St.	C1	MF	16	A
9	Commercial St.	C1	MF	55	A
10	Mendocino Ave.	R2	MF	11	A
11	Valley Street	R2	MF	36	A
12	Valley Street	R1	SF	72	A
13	Bush Street	R3	MF	137	B
14	Coast Street	R3	MF	21	A
15	Coast Street	R3	MF	37	A
16	Coast Street	R3	MF	42	A
17	Coast Street	R3	MF	50	A
18	Coast Street	R3	MF	116	B
19	Route 20	R1	SF	24	A
20	Route 20	C1	MF	50	A
21	Franklin Ave.	R2	MF	34	A
22	Baechtel Road	R2	MF	11	A
23	Baechtel Road	R2	MF	4	B
24	Baechtel Road	R2	MF	65	B
25	Route 101	C1	MF	41	B
26	Route 101	R2	MF	47	A
27	Route 101	RE	SF	133	A
N/A	Infill	R1	SF	32	A

Total Sites Suitable for Development = 1,631

* Key to Constraints Rating

- A = No zoning change required, land use constraints unlikely.
- B = No zoning change required, possible land use constraints.
- C = Zoning change required and land use conflicts likely. None of the sites on Exhibit 7-1 fall into this category.

8.000 OPEN SPACE INVENTORY

The purpose of this appendix is to provide an inventory of the City's existing parks and open space areas and to identify areas in which additional park sites would be appropriate. The City's network of open space and parklands should be expanded as necessary to accommodate future population and household growth.

8.100 Existing Open Space Resources

Exhibit 8-1 identifies the City's existing parks and designated open space areas. Collectively, the sites shown on Exhibit 8-1 comprise roughly 27 acres of parkland, representing approximately 5.3 acres per 1,000 residents. In terms of function, virtually all of the City's existing designated open space can be classified as suitable for outdoor recreational purposes. Willits parks are disproportionately concentrated in the central portion of the City; nearly 90 percent of the City's park acreage is located in City Park and the Recreation Grove in central Willits.

8.200 Future Parks and Open Space Areas

Exhibit 8-1 also identifies several sites which may be appropriate for future park use. Developers of residentially designated land can be assessed park impact fees or required to provide parks as part of their development projects. In this manner, the City's existing ratio of approximately 5 acres of parkland per 1,000 residents can be maintained.

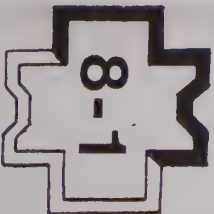
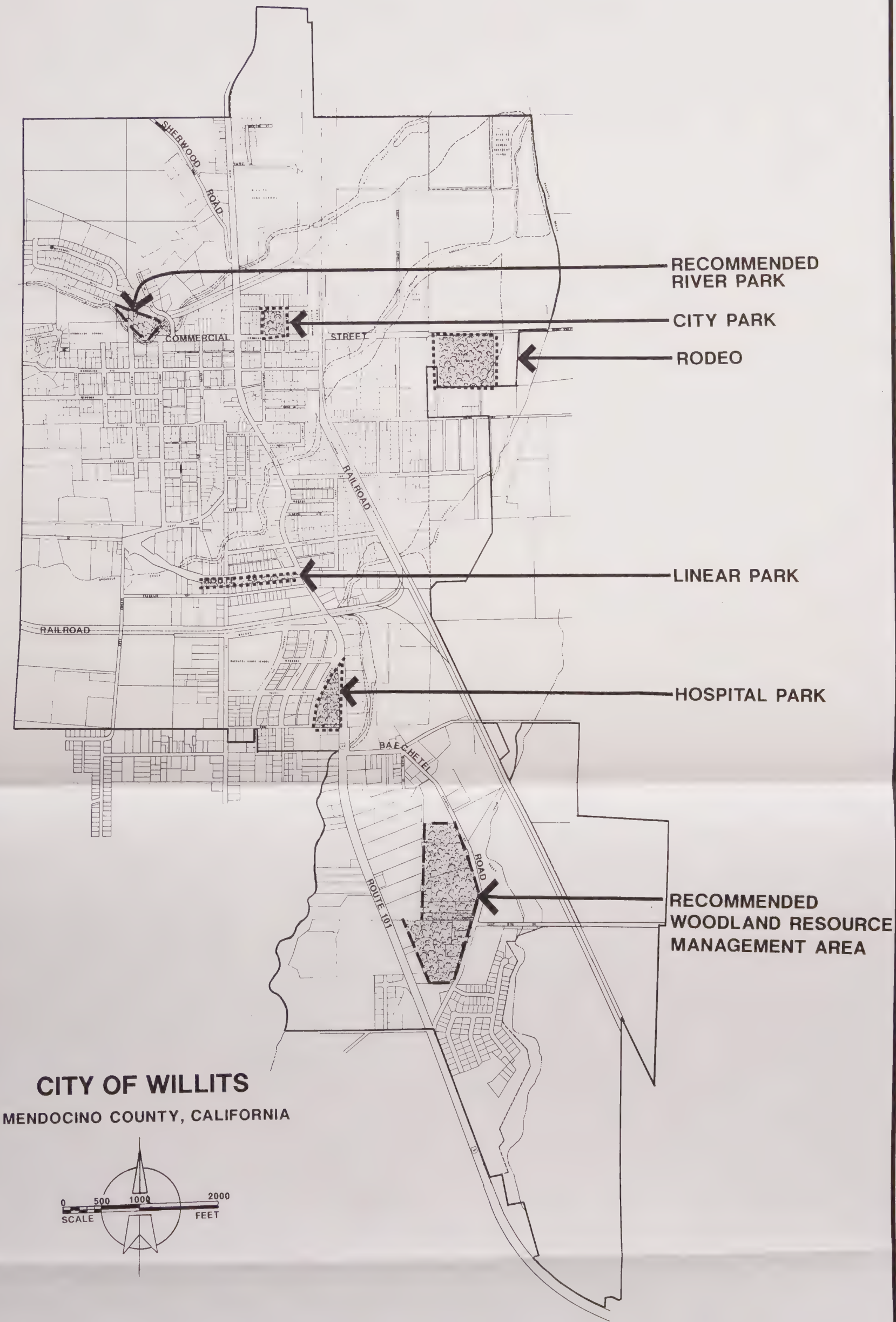
The potential new park sites shown on Exhibit 8-1 have been selected with the objective of increasing the availability of parks outside of the central portion of the City. Existing residents of outlying neighborhoods and residents of newly built neighborhoods will benefit from a more dispersed network of City parks and open spaces.

In addition to City designated parklands, open space may be provided as a result of conservation easements required as conditions of approval for projects in sensitive habitat areas. Such lands, classifiable as open space for the preservation of natural resources, will be designated on a case by case basis as a result of site-specific field observation.

Finally, in addition to locally designated parks, open space and conservation easements, a substantial portion of Willits remains in privately held open space. While the City does not directly control the use of these lands, it is likely that substantial portions of privately held open space in Willits will remain undeveloped for the duration of the planning period.

8.300 Summary

The City's existing open space inventory is sufficient to meet the needs of the current local population. Future population growth may necessitate expansion of the City's network of parks and open space, with an emphasis on increasing park availability in the newer and outlying neighborhoods. Developers of residential projects should be required to provide parks or in-lieu fees sufficient to maintain the City's standard of 5 acres of parklands per 1,000 residents.



LEGEND

- EXISTING SITES
- RECOMMENDED SITES

**WILLITS
GENERAL PLAN**

**PARKS &
OPEN SPACE
RESOURCES**

9.000 SAFETY APPENDIX

9.100 Community Safety Map

Exhibit 9-1 illustrates the City's flood zones, areas of significant seismic risk, evacuation routes and emergency facilities. The Community Safety Map should be distributed to schools, day care centers and public agencies for posting and distribution.

9.200 Fire Safety Standards

9.210 Roadway Specifications

Roads in Willits shall have a minimum width of 36 feet curb to curb. The maximum length of cul-de-sacs is 750 feet. Cul-de-sacs of more than 150 feet in length are required to have a 35 foot turnaround radius.

9.220 Other Fire Standards

The minimum overflow requirement for residences shall be 1,000 gallons per minute. Minimum vertical clearance of 14 feet is required for all fire access roads, with 20 feet of unobstructed width required between structures. In areas of high fire risk, the Fire District may impose greater minimum clearances between structures as a condition of approval. The minimum response time for fire protection services is five minutes or two miles in distance from the fire station.

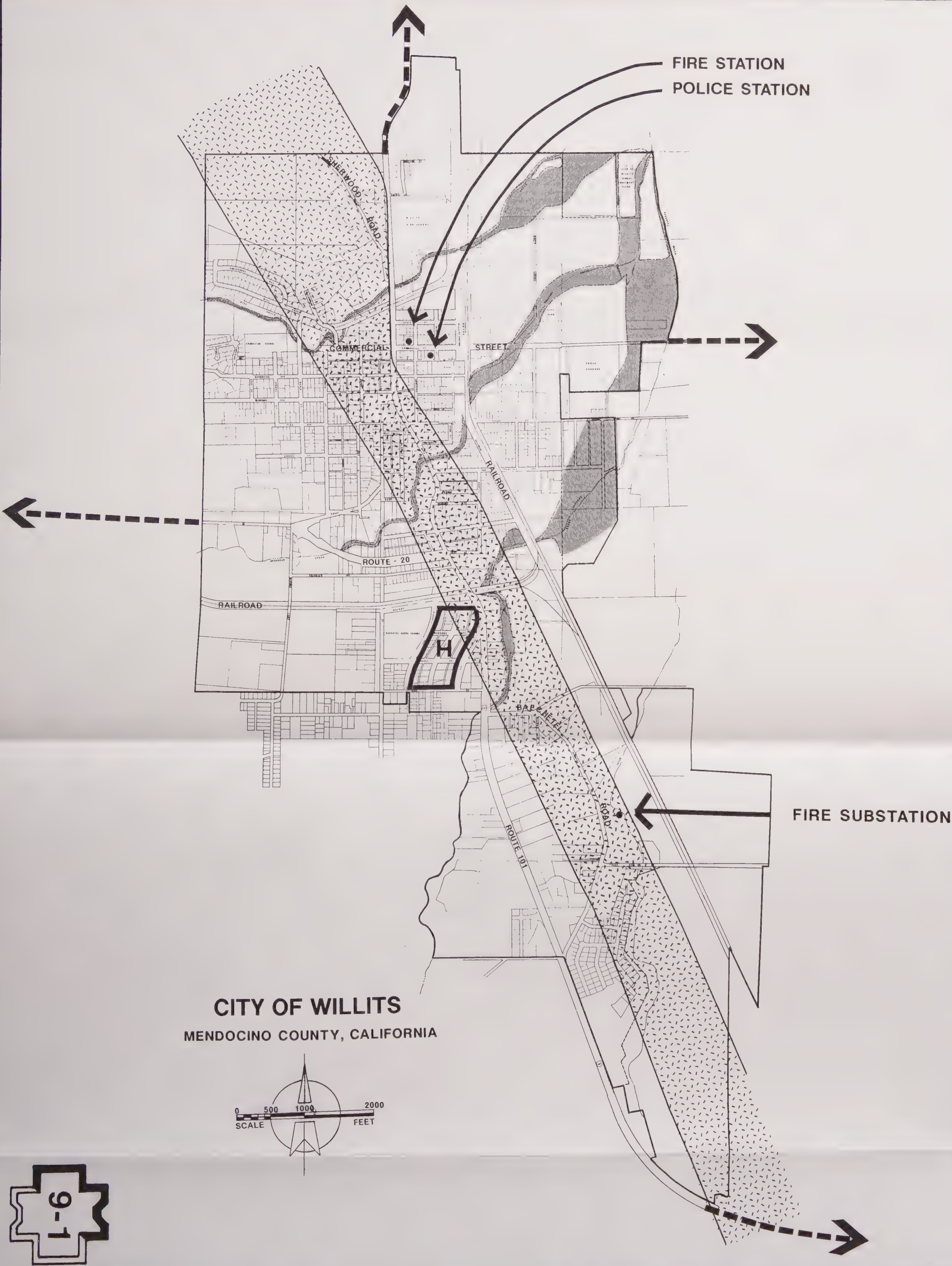
9.300 Flood Hazards

Widespread flooding is not a major problem in Willits although there are some localized flood problems. The Federal Emergency Management Agency (FEMA) has designated limited areas in Willits where 100-year flood inundation would be expected (Exhibit 9-1).

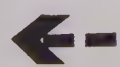



Flood problems in Willits generally relate to localized flooding along creeks with flow blockages, or to capacity limitations of storm drainage systems. Rather than simple flooding, problems are more likely to be caused by interactions of runoff with sediment. Streambank erosion is a significant issue, since streambank failures can lead to localized flooding if they block the stream channel. Similarly, hillside runoff is intertwined with the processes of erosion and landsliding. In summary, the most significant flood problems in Willits are those related to streambank and hillside erosion.

9.400 Seismic Hazards

The areas which pose the most likely seismic risk within the City of Willits are shown on the Community Safety Map. The most direct hazards of



LEGEND

-  EVACUATION ROUTES
-  HOSPITAL
-  SEISMIC STUDY ZONE
-  FLOODWAY

**WILLITS
GENERAL PLAN**

**COMMUNITY
SAFETY MAP**

earthquakes are surface fault rupture and severe groundshaking. Secondary hazards often triggered by seismic occurrences include landslides, fires and floods.

9.410 Seismicity

Earthquakes cause various geological processes that can cause severe damage to structures and danger to people. The Alquist-Priolo Special Studies Zones Act requires that the California Division of Mines and Geology prepare Special Study Zone maps which delineate all potentially and recently active faults which constitute potential hazards to structures.

Faults crisscross the surface of the earth. Most have not moved for hundreds of thousands or even millions of years and are considered inactive. Others show evidence of historic activity or have moved in the recent geologic past; these are considered active faults. A fault may be from several feet to several hundred miles long. Displacement occurs when the earth on one side of a fault moves in relationship to the earth on the other side.

Seismic hazards involved are not limited to the fault trace where the surface evidence of movement can be viewed. The hazards can be grouped into four main categories: ground shaking, surface faulting, ground failure and seismically induced water waves. Each of these natural phenomena is examined briefly in the following paragraphs.

Earthquake magnitude is measured at the point on the earth's surface directly above the point of origin of the earthquake. This point is called the epicenter. The Richter Scale is at present the most common measure of Magnitude. The Modified Mercalli Scale describes earthquake intensity. The two scales are compared below, as both are referenced by this report.

A potentially active fault is defined as any fault which has been active during Quaternary time (last 2,000,000 years). An exception is made when a Quaternary fault has been determined from direct evidence to have been inactive before Holocene time (last 11,000 years). The average interval between potentially damaging earthquakes (Magnitude 6.5 or greater on the Richter Scale) is not predictable within definite limits.

COMPARISON OF MAGNITUDE AND INTENSITY

RICHTER MAGNITUDE	MODIFIED MERCALLI INTENSITY	EXPLANATION
2	I-II	Usually detected only by instruments
3	III	Felt indoors
4	IV-V	Felt by most people, slight damage
5	VI-VII	Felt by all; many frightened and run outdoors; damage minor to moderate
6	VII-VIII	Everybody runs outdoors; damage moderate to major
7	IX-X	Major damage
8+	X-XII	Total and major damages

9.420 Ground Shaking

Earth tremors and shaking are felt far beyond the actual area of faulting and cause the greatest damage from an earthquake. Ground shaking may be accompanied by minor earth movements. If differential movement across a foundation exceeds an inch, the combined effects of shaking and movement on a structure can be catastrophic. The extent of damage will depend somewhat on design and construction. Problems can arise from any one or a combination of the following:

1. Failure of structure due to shaking.
2. Foundation failure due to soil bearing failure, including liquefaction.
3. Differential settlement of structure due to soil compaction.

9.430 Surface Faulting (Fault Rupture)

While considerable attention is given to locating surface faults (because this is visible evidence of their existence and invaluable in many respects) it is important to note that less than one percent of earthquake damage is caused by surface faulting, according to the California Division of Mines and Geology. Faults must be identified because a structure built over a fault trace will be ruptured if earth movement occurs.

9.440 Ground Failure

Earthquakes and landslides are the most common hazards in California and landslides may be induced by seismic activity. The greatest chance of ground failure or slope failure is near the epicenter of an earthquake and will depend additionally on the state and kind of rock materials. Water absorption, quality of the soil, cleavage and orientation of rocks are factors. Liquefaction occurs when sufficiently strong ground shaking shakes saturated, granular unconsolidated material. Failure on slopes of 1-2% has occurred.

Mendocino County may be divided into two main geological units:

1. The coastal belt of Cretaceous and Early Tertiary age; and
2. The eastern belt of Jurassic and Cretaceous age.

Some geologists group these units into the Franciscan Assemblage.

The Franciscan Assemblage is composed of marine sedimentary rocks, metamorphosed volcanic rocks, serpentinite and high grade metamorphic rocks known as eclogite.

Coastal belt rocks are somewhat younger than eastern belt rocks. There is also a difference in the mineral composition of the rocks which can be seen in the differences in appearance of the weathered rocks. Weathered coastal rock is light, yellowish-brown while eastern belt rock is a dull earthy brown.

Rocks of both belts are, with few exceptions, highly folded, faulted and fractured. There are zones up to a few miles wide and several miles long composed primarily of highly crushed rock formed as a result of tectonic stresses of the earth. These zones are referred to as melange and are landslide prone. This is a characteristic of the eastern belt.

There are occasional isolated areas of alluvial deposits found throughout the county. Little Lake Valley, parts of the Ukiah Valley, Potter Valley, parts of Hopland, parts of Anderson Valley, Eden Valley, Round Valley and Laytonville are alluvial areas. These deposits are nonmarine, poorly consolidated sands, silts, clays and gravels of Plio-Pleistocene Age.

Geologic rock types have been rated as to landslide potential; generally the eastern belt is most prone to landsliding, although the valley floors are relatively stable. The description above is very general and no conclusions concerning small areas of the county or individual sites can be made. The fact that rocks of both geographical areas of the county are generally "folded, faulted and fractured" and there are significant zones of landslide-prone melange, points out the need for soil testing and geological field investigation wherever large scale or important development is proposed. Access to a site as well as the safety of the site itself must be considered.

9.450 Geotechnical Hazard Zones

Mendocino County may be divided into four areas which have similar bedrock and soil characteristics, ground rupture potential, ground stability and flooding characteristics. These areas of similar geotechnical characteristics are called "Geotechnical Hazard Zones".

The boundaries of the Geotechnical Hazard Zones are a matter of judgment and cannot be precisely drawn. Each zone and related hazards are described separately in the following sections:

Hazard Zones

Zone I	San Andreas Fault Zone
Zone II	Maacama Fault Zone
Zone IIIa	Central County Zone - Coastal Belt
Zone IIIb	Central County Zone - Eastern Belt
Zone IV	North East County Zone

Zone I - The San Andreas Fault Zone. Description of Major Fault and Hazards. This zone is subject to all four types of seismic hazard: ground shaking, surface faulting, ground failure and seismically induced water waves. Conditions and hazards in Zone I are described below. Much of the material applies to all parts of the county. The other zones are therefore described but information included in the Zone I section is not repeated.

Faulting -- In 1906 the earthquake which devastated San Francisco was felt and registered as far north as Point Delgada just north of the Mendocino County line. At Fort Bragg, most brick buildings were destroyed and many frame buildings were shifted off their foundations.

C. R. Johnson, founder of the town of Fort Bragg and of the Union Lumber Company, was quoted in The Noyo Chief as follows:

"On the morning of April 18, 1906, the earth rocked so violently that it seemed as if some giant had taken it in his hands and was shaking it relentlessly. When it was all over, the mill was off its foundations and badly wrecked; and a large part of Fort Bragg was destroyed. As in San Francisco the quake itself was bad -- but the fire which followed was vastly worse and did most of the damage."

The 1906 earthquake was due to movement along the San Andreas Fault, the major fault running north and south near to or on the California Coast. The Geotechnical Hazard Zone Map shows the San Andreas Fault cutting through the southwest portion of the county.

North of Point Arena the San Andreas Fault is offshore and, if projected northwest along its trend line, probably does not again intersect the shoreline until Point Delgada. Sea floor geological and geophysical data are insufficient to determine with certainty whether or not the Shelter Cove Trace connects with the offshore portion of the San Andreas Fault. However, isoseismic data for the 1906 earthquake and recent offshore seismic reflection survey work suggest that the fault turns northward near Point Arena and connects with the trace at Shelter Cove.

It has been suggested by geologists that the section of the San Andreas which ruptured in 1906 and another section further south near Fort Tejon are characterized by occasional great quakes rather than frequent smaller (though still potentially damaging) earthquakes and tectonic creep. In a general way then, this seems to indicate that the area may be subject to infrequent but severe shocks. Only a few small earthquakes have occurred in this area since 1906. As stated earlier in the general information section, earthquake intervals cannot be predicted within short time periods; however, there is a very real possibility of a major earthquake

ranging in magnitude 6.5 to 8 within the next 25 to 50 years in this portion of Mendocino County and Zone 1 is considered as having the highest potential for disaster of the four zones in the county.

Careful land use planning and regulations for building and development will permit development to continue and reduce risk to acceptable levels. The area in Mendocino County most affected by any movement of this major fault is between Gualala and Point Arena, where the fault is onshore.

A brief description of movement during the 1906 earthquake, which had a Magnitude of 8.3, will illustrate the potential problems of this area. This part of the coast experienced intensities of IX to X on the Modified Mercalli scale. Horizontal displacement of the fault ranged from ten to sixteen feet and there was also minor vertical displacement, generally not exceeding one foot. Roads and railroads crossing the fault were rendered impassible. Structures straddling the fault trace were either destroyed or badly ruptured.

Between Shelter Cove and Point Arena the San Andreas fault lies from five to 25 miles west of the coast, depending on whether one assumes the fault connects with the Shelter Cove trace of 1906 or projects northwestward from Point Arena. A strong shock occurred in 1898 near Point Arena, yielding intensities VIII to IX, and damaging Mendocino, 25 miles away.

9.460 Ground Failure

Landslides in the coastal belt are usually slumps and earth flows. This is due to the geological history of the area and the high annual rainfall (in comparison to the rest of the county), steep slopes, and intense weathering. Roads heading inland do show evident of recent landsliding and an earthquake could cause road blockage. Highway 1 could be damaged by landslides associated with a major earthquake.

Grading for hillside development can trigger old landslides and initiate new ones. Tragic consequences of unwise hillside use have resulted from such actions in the Bay Area and in Los Angeles where houses have slid downhill. The steep slopes in the San Andreas Fault Zone should be protected both from an aesthetic standpoint and from that of public safety.

Most active landslides have total movements ranging from a few inches to hundreds of feet. In rare instances annual movements of about 300 feet have occurred. When these cross highways, railroad or utility lines, sizeable economic loss occurs. This risk of landslides should be taken into account when locating utility lines or development which will require such installations.

9.470 Ground shaking

This is a general hazard in all Mendocino County but is particularly important in the area of the San Andreas Fault Zone. Particular care must be used in locating structures necessary for public safety and those

Soil testing and geologic-seismic field investigations should be required before permitting construction of major projects, either public or private.

Zone II -- Maacama Hazard Zone. Description of Faults and Summary of Hazards. The Maacama Fault trends northwest from the Hopland area to Laytonville. This fault is considered potentially capable of generating a Magnitude of 7 or greater earthquake. The Geotechnical Hazard Zones Map shows that Zone II is rated high for landslide potential. Level valley floors are more stable than the steep valley walls and mountainous areas. Landslides and evidence of soil instability can be observed widely throughout the southern county. Cutting and grading hillsides is risky in many locations within this relatively landslide prone zone associated with the Maacama Fault. Steeply sloped and unstable valley walls and the alluvial deposits of the valley floors make the area subject to a combination of hazards. The chief hazard is landsliding and the secondary hazard is potential soil liquefaction due to accumulation of water in the alluvial soil. The tendency for landsliding and liquefaction is strengthened by the naturally heavy rainfall in the county. Road building and maintenance in steep unstable terrain has always posed problems and in a potentially active area such as Zone II particular care must be exercised. Maintenance of utility lines is also difficult in such areas. Where soil and terrain preclude safe and sure access, large scale urbanization must also be precluded. Land use planning for inland valleys must take these factors into account.

The complex geological conditions found in the county result in varying risks between valleys and even within one valley, and regulations should vary accordingly. Because the major concentrations of people are in the inland valleys, regulations are particularly needed and studies must be made which will lead to protection of existing and future populations.

Zone III -- The Central County Hazard Zone. Description of Faults and Summary of Hazards. There are many small faults in the Franciscan Assemblage. Most of these are generally considered to be inactive. The Healdsburg Fault is in this zone. Soil stability is poor in much of the area. Although the faults are at present considered inactive, significant numbers of people are living in areas which will be affected if movement were to occur. Earthquake risk is generally lower in Zones III and IV than in Zones I and II, but landslides in areas such as this can be triggered by minor earth movement, by heavy rainfall, weathering or other natural causes. Grading of hillsides for development increases the landslide risk unless competent professional assistance is employed. As urbanization continues, the hazards from shaking, slope failure and earth movement will increase unless development controls to minimize risks are implemented. The Geotechnical Hazard Zones Map shows general conditions for the area.

Zone III has been divided into two subzones. The Maacama Fault Zone is the approximate boundary between the two subzones. Zone IIIa is the Coast-

Coastal Belt of the Franciscan Assemblage. The Coastal Belt consists of younger and generally more stable rock units than the older rocks of the Eastern Belt which is designated as Zone IIb.

Zone IV -- Northeast County Hazards Zone. The northeast portion of Mendocino County is furthest removed from known active and potentially active faults. Only inactive faults are known in this region. Consequently, surface rupture is not expected. The level of ground shaking from distant active faults will be less than the western and southern areas of the county closer to the San Andreas and Rogers Creek Faults.

Potter Valley and Round Valley are significant areas because they are large, flat to gently sloping areas. Slope failure hazards are minimal compared to other areas in this zone. However, because locally saturated near surface conditions are known, the potential for liquefaction exists. Liquefaction requires the combination of sufficiently strong ground shaking, saturated conditions and relatively "clean" granular materials. Without specific soil tests and seismic investigations, it is not possible to determine the significance of the liquefaction potential.

Landslides are the most significant geologic hazard in the Northeast County Hazards Zone. Any area of 20% or steeper slope in the Franciscan Assemblage rocks should be treated as having a potential for existing or induced slope failure unless there is geologic evidence to the contrary.

9.500 Alquist-Priolo Special Studies Zones

The Alquist-Priolo Special Studies Act, in effect since March 7, 1973, requires that special studies zones be delineated along known active faults in California, and that cities and counties must withhold permits for certain specified development projects within the special studies zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting. In Mendocino County special studies zones have been established along several fault traces associated with the San Andreas Fault in the Point Arena-Guala vicinity. Additionally, special studies zones maps prepared by the California Division of Mines and Geology are on file in the Willits Planning Department office. The Division of Mines and Geology has studied segments of the Maacama Fault from Hopland to Laytonville, including the Willits area.

Although Willits does not have a recent history of seismic activity, the presence of potentially active faults within the City necessitates that safety precautions be taken. This is especially true with respect to structures proposed within the seismic safety zone outlined on Exhibit 9-1.

10.000 HISTORICAL AND ARCHAEOLOGICAL RESOURCE INVENTORY

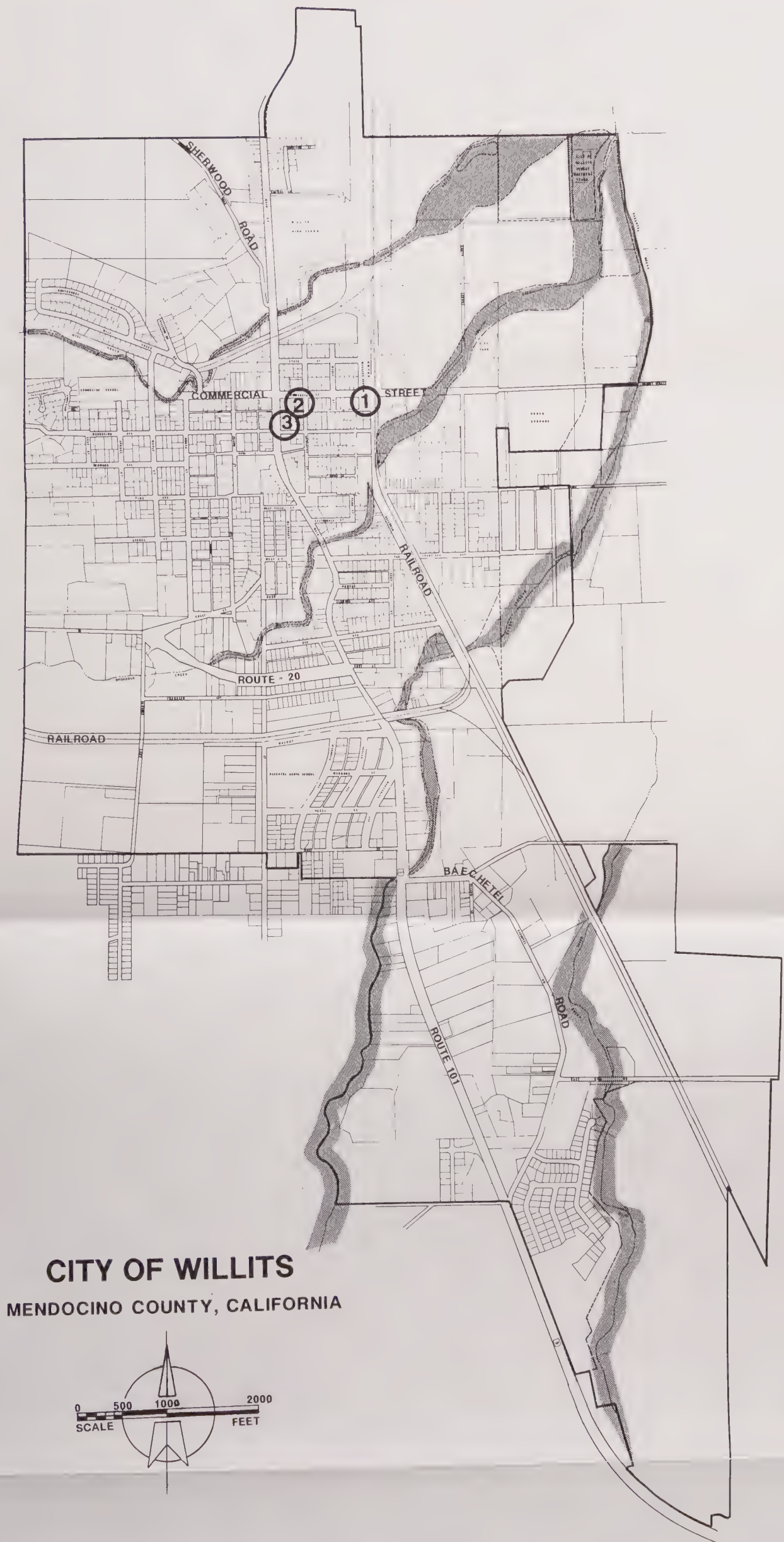
This appendix contains a map showing the state-listed historical structures in the City and the portions of the planning area which are regarded as archaeologically sensitive. The primary source of data contained in Exhibit 10-1 is a review of literature and public records conducted by the California Archaeological Inventory at the request of the General Plan consultant. The information derived from this review suggests that Willits is situated in an area of high archaeological sensitivity. Several prehistoric sites have been noted in the vicinity of the City and the ethnographic village of Mitoma is reported to be in the southwestern part of the City. Prehistoric cultural resources are most likely to be found at the base of hills and along seasonal and perennial water courses. These areas have been identified as potentially sensitive on the Historical and Archaeological Resources Map.

In terms of historical resources, Exhibit 10-1 presently identifies only sites which are listed by federal or state inventories of historic properties. Many cities choose to identify additional sites of local cultural and historical significance. At some point in the future, the City may wish to make additions to the Historical and Archaeological Resources Map as a means of ensuring the preservation of locally significant historical resources.

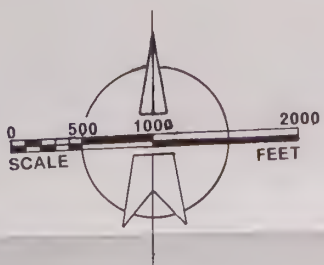
Because of the special sensitivity of the planning area with respect to archaeological resources, special attention should be paid to identifying and preserving such resources in the review of development projects under the Revised General Plan. Provisions for site-specific assessment in archaeologically sensitive areas are included in Section 4.930 of the Environmental Impact Report (Volume 3).

HISTORICAL
AND
ARCHAEOLOGICAL
RESOURCES


WILLITS
GENERAL PLAN



CITY OF WILLITS
MENDOCINO COUNTY, CALIFORNIA



LEGEND

- ① SKUNK TRAIN DEPOT
- ② WILLITS CARNEGIE LIBRARY (85 EAST COMMERCIAL STREET)
- ③ IRVINE & MUIR COMPANY (212 SOUTH MAIN STREET)
-  AREAS OF POTENTIAL ARCHAEOLOGICAL SIGNIFICANCE

10-1

11.000 PUBLIC SERVICES AND FACILITIES

This appendix contains a brief description of the City of Willits' network of public services and facilities. In addition, the capacity of the local service delivery network to accommodate future increases in population, housing, commercial and industrial activity under the preferred growth alternative is assessed.

11.100 Water

The City's water resources have been assessed by the City of Willits and the California Department of Water Resources in two 1987 reports titled, "A Limnological Investigation of Morris Reservoir" and "Ground Water Study". These reports and calculations made by the City's chief water plant operator show that with or without future growth, Willits is highly dependent upon annual rainfall for its water supply. This dependence should be taken into consideration in evaluating the capacity of the delivery system to accommodate increased demand for service.

The City of Willits currently supplies its own water by storing rainfall in two local reservoirs, one half a mile upstream of the other on Davis Creek. Morris Dam and Centennial Dam were completed in 1927 and 1990 respectively. These two reservoirs supply potable water for the City during summer months while Davis Creek supplies the water during winter months. A new water treatment facility and inlet structure were constructed in 1989 which eliminated the water quality problems that occurred during times of drought.

Morris Dam is located 5 miles southeast of the City. The concrete dam impounds water from the Davis Creek watershed which covers a 5.5 square mile area. The watershed area is not incorporated, but it is owned by the City of Willits. The watershed is subject to the effects associated with trespassers, wild game, limited cattle grazing, limited timber harvesting, and the Northwestern Pacific Railroad corridor.

Morris Reservoir has a surface area of roughly 60 acres. It would have a capacity of 735 acre feet but due to siltation over the last 63 years, 100 acre feet have been displaced. Silt displacement of water has occurred at a rate of 0.2% per year totaling nearly 13% over the life of the reservoir to date. At this rate it would take an additional 200 years to fill the reservoir 50%. Dredging is not possible at this time due to prohibitive costs and water quality problems regulated by the Department of Fish & Game.

Groundwater is pumped from the City's Park Well on Commercial Street solely for irrigation purposes, while in the valley outside the City limits water is pumped from private wells for all purposes. It was estimated in a U.S.G.S. oral investigation report that 2000 acre-feet are used annually by well users throughout Little Lake Valley. It was also estimated in the

1985 Department study that 60,000 acre feet are available in the valley with an annual recharge rate of 10,000 acre-feet. While the volume of water available is great, the cost of raising water quality to standards of safe drinking water would be high.

In 1985 Kennedy & Jenks Associates prepared a Water System Master Plan to determine the status and needs of the City. Since that time the Centennial reservoir was created to double water storage capacity. Despite the recent improvements, the City's water supply is still constrained by the storage capacity of the two reservoirs. The combined capacity of Morris and Centennial Lakes is 1,310 acre feet; this is the amount of water available during the dry season. The dry season may run May through October or it may last several years.

The City's current annual demand is 1190 acre-feet. This is the amount of water used for 2055 residential units, plus commercial and industrial purposes throughout the whole year. Roughly half of that (600 acre-feet) is drawn during the summer from the reservoir and half is drawn during the winter from Davis Creek. In a "normal" year there would be 710 acre-feet left in the reservoir at the end of the dry season. However, erratic weather patterns have resulted in frequent droughts of varying magnitude. These droughts can have severe impacts on the water supply.

Even minor droughts can affect the water supply by causing low stream flows. Because Davis Creek is dammed, the Department of Fish and Game, acting through the powers of the Department of Water Resources has recently begun to regulate the release flows from the dam. The County Health Department, which monitors community needs, is concerned that release requirements may exceed stream flows which would mean an additional demand on the reservoir during the dry season.

As of May, 1990, there were 2,055 existing hookups, with an estimated capacity for a total of 3,900 hookups. That would indicate that 1,845 hookups are available. Given the dependence on winter rains, however, care should be taken in the allocation of the City's water capacity. Considering the release requirements and the effects of prolonged drought, it seems more reasonable to assume the existing system clearly has a capacity for 900-1000 hookups. Development beyond this level would require detailed studies regarding the demand of release flows and projected development.

The preferred growth scenario calls for approximately 826 additional residential units by 2020. In addition, annual economic growth of 1.5 to 3 percent would result in increased commercial and industrial demand for water. In the aggregate, the City's existing water supply appears to be adequate to accommodate the level of growth posited under the Revised General Plan while allowing for a small margin of safety in the event of prolonged drought conditions. Growth in excess of Scenario 1 levels would be likely to strain the capacity of the local water supply.

11.200 Wastewater Collection and Treatment

The City's wastewater collection system is in poor condition. According to a 1989 feasibility study prepared by Harris Consultants, antiquated collection pipelines are causing substantial inflow and infiltration. The Harris study prioritizes needed improvements and provides cost estimates (in 1989 dollars) ranging from \$2.8 million for higher priority items only to \$6.3 million for all needed improvements. Efforts are underway to formulate and implement plans for rehabilitation of the local wastewater collection system.

In addition to repairing the existing collection network, plans are underway to extend sewerage to the City's newly annexed areas. A financing package has recently been obtained from the Farmers Home Administration in support of this project.

Finally, planned expansion at Brooktrails will necessitate new sewer lines to replace the existing undersized collection pipeline. Ideally, this work should be planned to coincide with local pipeline improvements in the same vicinity.

Willits is served by its own wastewater treatment facility, which has a dry weather capacity of 1.3 million gallons per day (mgd). Present usage amounts to .85 mgd, including .15 mgd from Brooktrails Township. (By contract, Brooktrails is entitled to 33 percent of the City's treatment capacity). Expansion of the plant to a capacity of 2.3 mgd is planned for 1996-2001. The expanded treatment facility will have sufficient capacity to accommodate both Brooktrails and Willits growth under the preferred scenario.

11.300 Solid Waste Disposal

Willits is served by a local landfill which receives 8,200 tons of solid waste annually, including trash from Willits, Covello and surrounding unincorporated areas. The remaining capacity of the landfill is estimated at two years. An application has been filed with the California Integrated Waste Management Board for a permit to expand the capacity of the landfill to 7-9 years.

Ultimately, a regional solution to the solid waste disposal problem must be found. A joint powers authority has been given jurisdiction over regional solid waste issues. A tentative agreement has been reached for an interim site in Ukiah, which would require a transfer station in Willits. AB 939 requires a 25 percent reduction in landfill volumes by 1995 and a 50 percent reduction by 2000. In view of this requirement and the likelihood of a solid waste transfer station being located in Willits, establishment of regional recycling facilities in the vicinity should be seriously considered.

11.400 Public Safety

Police services are provided by the Willits Police Department. Fire protection falls under the jurisdiction of the Little Lake Fire District. The police station is located on the 100 block of Commercial Street, across from City Park. The fire station is on the northwest corner of Commercial and Humboldt Streets.

Future growth assumed under the preferred scenario can be expected to generate demand for increased police and fire protection services. In the absence of impact fees, funds for service expansion will have to come primarily from increases in sales and property tax revenues.

11.500 Utilities

Electricity and natural gas are provided to the planning area by Pacific Gas and Electric Company. Sufficient capacity exists to accommodate future planned residential, commercial and industrial growth.

On the other hand, many residents of Willits and the surrounding area have chosen to remain "off the grid", relying upon solar energy, propane generators, wood stoves and other alternative energy sources. For this reason, the usage of conventional utilities associated with future area growth may not increase as much as it would in communities with lower levels of alternative energy awareness.

11.600 Administrative Services

Local administrative services, including planning, budgeting, management, building inspection, parks and recreation are headquartered at City Hall, located at 111 Commercial Street. Future growth can be expected to generate greater demands on the City's administrative bureaucracy. This may necessitate staff growth or increased privatization of administrative services through contracting.

12.000 REFERENCES

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VOLUME 3

CITY OF WILLITS
GENERAL PLAN REVISION
VOLUME 3
ENVIRONMENTAL IMPACT REPORT

1.000 EXECUTIVE SUMMARY

1.100 Introduction

The following Environmental Impact Report (EIR) addresses the potential environmental effects of the proposed revisions to the Willits General Plan. The EIR contains all sections specified under the California Environmental Quality Act (CEQA) and State CEQA Guidelines. The environmental review process consists of two steps: preparation and public review of the Draft Environmental Impact Report (DEIR), and preparation and certification of the Final Environmental Impact Report (FEIR).

This document is an informational tool which will enable citizens and public decision makers to evaluate the potentially significant environmental effects of the newly revised General Plan elements. It identifies and evaluates the environmental impacts that may result from the implementation of the proposed revisions, analyzes possible alternatives to the proposed course of action, and discusses mitigation measures which may be employed to ameliorate significant environmental impacts.

As a program EIR, this document establishes a framework for assessing the potential environmental impacts of subsequent development projects proposed within the City. It is recognized, however, that additional site specific environmental analysis may be required as part of the development review process.

Following this introduction, Chapter 2 of this DEIR contains a detailed description of the proposed project, Chapter 3 provides a brief overview of the City's environmental setting, and Chapter 4 considers potential environmental effects of the proposed revisions and sets forth recommendations for mitigating the significant adverse effects identified. Chapter 5 addresses additional topics required by CEQA, including the project's growth inducing, cumulative and irreversible impacts. Alternatives to the proposed project are presented in Chapter 6.

This is a Draft Environmental Impact Report available for public review and comment. Readers are invited to submit written comments to:

Gaither Loewenstein
Martin.Carpenter.Associates
1640 Laurel Street
San Carlos, CA 94070

In addition, a public hearing before the City Council will be scheduled for the purpose of receiving further public comments on the DEIR. Following the close of the public review and comment period, responses to all substantive comments will be prepared and any necessary revisions will be made to the DEIR. The responses to comments, along with the amended DEIR, constitutes the Final EIR, which will be certified by the City Council upon the Council's determination that it adequately complies with CEQA.

1.200 Summary of Impacts and Mitigation Measures

IMPACT	MITIGATION MEASURES
<u>Circulation</u>	
<ul style="list-style-type: none"> . Reduced level of service on roadways due to traffic increases 	<ul style="list-style-type: none"> . U.S. 101 bypass . Intersection improvements . Traffic impact studies/fees . Bicycle/pedestrian pathways . Mass transit feasibility study . Park and ride lots incorporated into residential development proposals
<u>Air Quality</u>	
<ul style="list-style-type: none"> . Increased pollutants from automobiles and industry . Increased pollutants from wood-burning stove 	<ul style="list-style-type: none"> . Traffic reduction mechanisms (see above) . Low-emission wood-burning stoves . Project-specific impact assessment . Regulation of construction activities
<u>Noise</u>	
<ul style="list-style-type: none"> . Increased noise from vehicle traffic . Noise generated by commercial/ industrial growth 	<ul style="list-style-type: none"> . U.S. 101 bypass . Site-specific assessment and mitigation of noise impacts . Load limits on Main Street
<u>Seismic Safety</u>	
<ul style="list-style-type: none"> . Exposure of people to earthquake risk 	<ul style="list-style-type: none"> . Require geologic, seismic, soil analyses for projects located within special studies zones . Prohibit structures within 50 feet of mapped fault traces . Minimum seismic safety standards

IMPACT

MITIGATION MEASURES

Hydrology

- | | |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">. 33% increase in water consumption. Exposure of people to flood risks. Increased wastewater volume | <ul style="list-style-type: none">. Mandate use of water-saving devices in new construction. Restrict development in 100 year flood zone. Expand treatment plant capacity. Rehabilitate sewer system to reduce infiltration and inflow |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Biological Resources

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">. Possible loss of sensitive plant communities. Possible damage to riparian corridors. Heritage tree removal | <ul style="list-style-type: none">. Site-specific project review with extra scrutiny along riparian corridors and in Valley Oak Woodland. Revegetate sites using native species. Enact tree preservation ordinance |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Visual Character

- | | |
|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">. Alteration of existing visual aesthetics | <ul style="list-style-type: none">. Preserve trees and other significant visual features. Incorporate consideration of visual aesthetics into application review process |
|--------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Historical/Archaeological Resources

- | | |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none">. Potential disturbance of archaeological resources. Encroachment on views of historic structures or diminution of their significance | <ul style="list-style-type: none">. Field observation with appropriate mitigation required if indicated by California Archaeological Inventory review. Consider visual and architectural impacts of projects on significant historical structures |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

2.000 PROJECT DESCRIPTION

2.100 Project Location

Willits is located in central Mendocino County, along U.S. 101 at the junction of the California Western and Northwestern Pacific railroad lines. The City of Ukiah lies approximately 20 miles south of Willits via U.S.

101. Fort Bragg is located roughly 34 miles east of Willits via State Route 20. The City is surrounded by unincorporated lands, with agricultural open space the predominant land use outside the City limits. Brooktrails Township, an unincorporated residential community containing approximately 1,000 dwelling units, lies immediately west of incorporated Willits.

2.200 Project Area

The total incorporated area of Willits is approximately 2.8 square miles, according to the 1990 U.S. Census. The Willits Sphere of Influence is determined by the Local Agency Formation Commission and extends beyond the City limits, primarily to the west and south.

2.300 Project Description

The proposed project involves the preparation of a revised General Plan, including all seven state-mandated elements (Land Use, Circulation, Housing, Noise, Conservation, Open Space and Safety) as well as an Economic Development Element. In addition, changes to the Zoning Ordinance will be required to implement the proposed General Plan Revision. Under the preferred growth scenario contained in the Draft General Plan, no significant changes in designated land uses are contemplated. Future development is expected to occur on lands already designated for residential, commercial and industrial uses. Expansion of the City limits to accommodate residential estates in the Southwest portion of the planning area is likely to occur by 1995. This annexation has been incorporated into the preferred growth scenario for the purpose of quantitative analysis. A separate EIR will be prepared at the time the annexation is submitted to analyze issues not addressed by this report.

3.000 ENVIRONMENTAL SETTING

Willits lies at the foot of a coastal mountain range, along the western periphery of Little Lake Valley. The surrounding wooded ridgelines, juxtaposed against the coastal prairie grasslands of the Valley, contribute to the City's high quality environment.

Environmental conditions within the City itself are reflective of Willits' history as a subregional commercial and industrial center. Over the years, the natural environment within the City has been substantially altered as a result of residential, commercial and industrial development. Future growth, for the most part, is planned to occur in areas which have already been affected by previous urban development within the project area.

Although past development has altered the City's existing environment, Willits retains a "small town" character which is reflected in the design of its residences, commercial buildings and public open space. In planning

for future population and household growth, care must be taken to retain this aspect of the community.

In many respects, the City stands at a crossroads between adherence to the bedroom community model often promoted by developers and land speculators and the more difficult to achieve objective of a self-sustaining City. The former concept is strongly associated with adverse environmental effects such as traffic congestion and air pollution, while the latter approach has the potential for minimizing commuting and its negative impacts by locating jobs closer to the people who hold them.

The City's location along the U.S. 101 growth corridor suggests that Willits is increasingly linked to the growing San Francisco Bay Area, particularly with regard to the emerging employment center in and around Santa Rosa. In this context, it is important for the City to avoid the adverse environmental consequences of becoming a "bedroom suburb" by retaining a strong employment base to provide jobs for existing and future Willits residents. By designing a self-sustaining community with a balance of jobs and housing, the environmental impacts of future growth can be minimized.

In the short term, it is much easier to attract the interest of builders and developers with conventional residential subdivisions geared toward commuters. It is much more difficult to induce employers who will contribute to the long-term vitality of the community to locate in the City. Nevertheless, the long-term benefits of a strategy based on local employment development, however difficult such a strategy may be to implement, could be significant both economically and environmentally.

The General Plan may be viewed as a tool for reaching the goal of a self-sustaining City. It establishes a framework by which future proposals for development can be assessed and prioritized.

This EIR is based on the assumption that the City of Willits will grow in accordance with the self-sustaining model, with commercial and industrial development occurring at roughly the same pace as residential growth. This is consistent with the land use policies contained in Volume 1 of the General Plan.

4.000 ENVIRONMENTAL ANALYSIS

In the following sections, the impact of the General Plan Revision on the City's existing environmental setting will be assessed. This document constitutes a generalized environmental analysis; site-specific environmental assessment may be required for individual development projects proposed under the revised General Plan.

4.100 Land Use

4.110 Setting

Section 3.000 of the General Plan Technical Appendices (Volume 2) provides an inventory of the City's existing land uses and a map showing official land use designations. Willits consists primarily of lands designated for residential, commercial and industrial use with open space, public facilities and roadways comprising the remainder of the City's existing land uses. The existing pattern of land uses in Willits is, for the most part, conducive to retaining its small town character while accommodating future increases in local population.

4.120 Impacts

Because future growth anticipated under the revised General Plan would occur in accordance with existing land use designations, the present distribution of land uses would not be significantly affected. There would, however, be an increase in land use intensity in certain areas designated for residential, commercial and industrial use. For example, existing lands designated for multi-family residential use (as well as lands designated for commercial use which permit multi-family construction) are expected to be developed at densities close to the maximum permitted. Similarly, presently underutilized industrial properties may be more fully developed within the parameters of existing building intensity limitations. Although increased intensity of development consistent with current land use designations will not significantly alter the existing distribution of land uses, it may generate adverse traffic, noise, air quality, biological, cultural or archaeological impacts. These potential impacts are addressed in various sections of this report.

While development in accordance with the General Plan Land Use Diagram (Exhibit 3-1 in Volume 2) is not expected to have adverse land use impacts, the changes in land use suggested by Exhibit 3-2 are likely to result in a significant alteration of prevailing land use patterns. In the event that these sites are considered for changes in use, additional analysis of adverse land use impacts may be warranted.

4.130 Mitigation Measures

Because the proposed project calls for development within the parameters of existing land use policies and zoning designations, the current distribution of land uses in the City will not be significantly affected. Should the City choose to adopt one or more of the changes in land use suggested by Exhibit 3-2 of the Land Use Appendix, additional analysis and mitigation of land use impacts may be required.

4.200 Circulation

4.210 Setting

The City's circulation network is described in detail in Chapter 4.000 of the General Plan Technical Appendices. This report focuses upon existing circulation problems, potential future impacts on the circulation network and mechanisms for improving the flow of people and products in Willits. It is based on an analysis conducted by TJKM Transportation Consultants which is available under separate cover.

Most of the City's existing circulation problems can be attributed to the community's heavy reliance upon a single roadway, Main Street (U.S. 101), and a single mode of transportation, the automobile. Main Street presently carries much of the City's automobile and truck traffic as well as many of its pedestrians and bicyclists. Mass transit availability is limited; Mendocino Transit Authority provides bus service from City Park south to Ukiah, but locally oriented scheduling is minimal. Bicycle ridership, while high, poses a safety threat along U.S. 101 as bicycles, trucks and motorists utilize the same overburdened facility. Moderate to heavy traffic congestion exists along Main Street, especially during afternoon peak hours, at noontime and on holiday weekends. This is attributable, in large part, to the high proportion of through traffic utilizing this roadway. Seasonally, Willits experiences its highest traffic congestion during the summer months, with aggregate traffic levels increasing by nearly one-third over winter and spring traffic volumes.

4.220 Impacts

While some of the City's existing circulation network problems will be alleviated by the eventual construction of the U.S. 101 bypass, other problems will be created by future planned growth. The positive impacts of the bypass will include diversion of through traffic off of Main Street and reduction of dependence upon Main Street as the City's only north/south roadway alternative. Although this will create some additional capacity, future planned growth at Brooktrails and within the City limits will largely offset any improvement in this regard. Table 4.2-1 provides estimates of existing and unmitigated buildout roadway conditions under the preferred circulation network alternative.

TABLE 4.2-1: INTERSECTION LEVELS OF SERVICE:
Existing Conditions and Projected Impacts¹
(P.M. Peak Hour)

INTERSECTION	1991		BUILDOUT ²	
	³ V/C	⁴ LoS	V/C	LoS
Main/Sherwood	.64	B	.80	C
Main/Commercial	.88	D	1.81	F
Main/State Route 20	.81	D	1.75	F

1. Data derived from TJKM General Plan Update: Traffic Analysis, 1992.
2. Buildout estimates based on Caltrans U.S. 101 Bypass Alternative C, Brooktrails Access Alternative 3. Different bypass and access alternatives result in different traffic estimates. See General Plan Update: Traffic Analysis, 1992 and Volume 2, Chapter 4 of this document for details. Buildout estimate does not include mitigation measures contained in this report.
3. V/C = Volume to capacity ratio. A quantitative measure of operating conditions at signalized intersections (1.00 = full capacity).
4. LoS = Level of Service. Classifies roadways based on traffic conditions (A = smooth flowing; F = gridlock). LoS D is generally regarded as the minimum standard.

4.230 Mitigation Measures

The mitigation measures in this section are designed to reduce the build-out levels of service shown in Table 4.2-1 to LoS D or better. Adoption of the measures listed below will effectively eliminate gridlock on the streets of Willits.

4.231 Traffic impact studies shall be required for all development projects expected to generate more than 50 peak hour vehicle trips. Projects shall not be approved unless they include acceptable mitigation of estimated traffic impacts.

4.232 Consistent with the provisions of AB 1600, developers of residential, commercial and industrial properties may be assessed traffic impact fees to cover their share of roadway improvements necessitated by project related growth. These fees, or their equivalent, may apply to development outside of the City limits which directly affects local traffic conditions.

4.233 The City shall designate a bicycle route and distribute maps of the bikeway to schools and other interested individuals and organizations as a means of encouraging bicycle use.

4.234 The City shall study the feasibility of providing regularly scheduled bus or van service from Brooktrails to the Evergreen Shopping Center, either through expansion of existing MTA lines or by providing service at the local level. The study should investigate the feasibility of funding this service through a combination of grants from Willits and Brooktrails Township, participation from local businesses and fares paid by riders.

4.235 Bicycle storage areas shall be required as a condition of approval for all new commercial developments employing 50 or more workers and for all multifamily residential projects of 10 or more units.

4.236 Bicycle and pedestrian pathways which connect to the City's existing circulation network should be required components of any approved residential planned unit development project of 25 or more single family dwelling units.

4.237 Park and ride lots should be included in the design of residential subdivisions or planned communities of 50 or more dwelling units.

4.238 On completion of the U.S. 101 bypass, load limits shall be established on Main Street between State Route 20 and Commercial Street to reduce truck traffic on this portion of the roadway.

4.239 As necessitated by future increases in traffic volumes, the following roadway network improvements will be implemented:

- A) At the intersection of Main and Commercial Streets, add an exclusive right turn lane in the northbound direction and exclusive left turn lanes in the westbound and eastbound directions.
- B) At Main Street and State Route 20, add exclusive right turn lanes in the southbound and westbound directions and an additional left turn lane in the eastbound direction.

4.300 Air Quality

This air quality discussion addresses potential air quality impacts that may result from the Willits General Plan Update. Section 4.310 describes existing meteorology, ambient air quality and the regulatory framework within which the plan would operate. Section 4.320 presents projected air quality impacts resulting from implementation of the plan. Finally, Section 4.330 identifies appropriate mitigation measures which may be implemented in order to minimize significant impacts.

4.310 Setting

4.311 Applicable Regulations, Standards and Policies. Ambient Air Quality Standards (AAQS) represent the maximum levels of background air pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The five primary pollutants of concern for which standards have been established are ozone (O_3), sulfur dioxide (SO_2), carbon monoxide (CO), nitrogen dioxide (NO_2), and particulate matter smaller than 10 microns in diameter (PM_{10}). National Ambient Air Quality Standards (NAAQS) were set by the Federal Clean Air Act of 1970, as amended in 1977 and 1990 with states retaining the option to develop more stringent standards. Because of unique air quality problems in California, the California Air Resources Board (CARB) under the California Clean Air Act has developed California specific AAQS which are more stringent than the Federal standards. The Act also emphasizes reducing ozone precursors in order to reduce smog. Ozone is a secondary pollutant formed by complex chemical reactions involving hydrocarbons (HC), oxides of nitrogen (NO_x) and sulphur (SO_x), and sunlight. Exhibit 4.3-1 lists the currently applicable state and federal standards. The federal standards are not to be exceeded more than once per year. The CARB's policy for determining violation of a state standards is a "not to be exceeded" policy for O_3 , SO_2 , NO_2 , and PM_{10} . The remaining standards are not to be equalled or exceeded. In 1979, the Environmental Protection Agency (EPA) required each state to prepare a State Implementation Plan (SIP). A SIP is a compilation of goals, strategies, schedules, and enforcement actions that will lead the State (including Mendocino County) into compliance with all federal air quality standards.

The NAAQS were targeted to be achieved in each air basin by 1982; however, extensions to 1987 were granted to many air basins that incorporated available emissions control tactics into their SIPs but could not attain some standards by 1982. Tasked with meeting federal air quality standards in California, the CARB required each air basin to develop its own strategy for achieving standards.

The Mendocino County Air Pollution Control District (APCD) includes Willits and is responsible for preparing the local Air Quality Management Plan for inclusion in the California SIP. The Mendocino County APCD is responsible for the implementation of Federal and State air quality regulations. Related activities include quantification of present emissions, estimation of future emissions, and development of pollutant control strategies for the attainment and maintenance of state and federal standards.

4.312 Meteorology/Climate. The City of Willits is located in Little Lake Valley in the North Coast Range, approximately 27 miles east of the Pacific Ocean at an elevation of approximately 1,400 feet above mean sea level. Rainfall mainly occurs between October and May, and averages 54.05 inches per year. Rainfall in the area exceeds 0.01 inch on about 120 days per year (U.S. EPA, 1985). Temperatures vary from a minimum of 14° F in January to a maximum of 108° F in July, with an annual average of

POLLUTANT	AVERAGING TIME	CALIFORNIA STANDARDS (1)		NATIONAL STANDARDS (2)		
		Concentration	Method	Primary	Secondary	Method
Ozone	1 Hour	0.09 ppm (180 µg/m ³)	Ultraviolet Photometry	0.12 ppm (235 µg/m ³)	Same as Primary Standards	Ethylene Chemiluminescence
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m ³)	Nondispersive Infrared Spectroscopy	9.0 ppm (10 mg/m ³)	Same as Primary Standards	Nondispersive Infrared Spectroscopy
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)		
Nitrogen Dioxide	Annual Average	-	Gas Phase Chemilum- inescence	0.053 ppm (100 µg/m ³)	Same as Primary Standards	Gas Phase Chemiluminescence
	1 Hour	0.25 ppm (470 µg/m ³)		-		
Sulfur Dioxide	Annual Average	-	Ultraviolet Fluorescence	0.03 ppm (80 µg/m ³)	-	Pararosaniline
	24 Hour	0.05 ppm (131 µg/m ³)		0.14 ppm (365 µg/m ³)	-	
	3 Hour	-		-	0.5 ppm (1300 µg/m ³)	
	1 Hour	0.25 ppm (655 µg/m ³)		-	-	
Suspended Particulate Matter (PM - 10)	Annual Geometric Mean	30 µg/m ³	Size Selective High Volume Sampler and Gravimetric Analysis	50 µg/m ³	Same as Primary Standards	Inertial Separation and Gravimetric Analysis
	24 Hour	50 µg/m ³		150 µg/m ³		
Sulfates	24 Hour	25 µg/m ³	Turbidimetric Barium Sulfate	-	-	-
Lead	30 Day Average	1.5 µg/m ³	Atomic Absorption	-	-	Atomic Absorption
	Calendar Quarter	-		1.5 µg/m ³	Same as Primary Standards	
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m ³)	Cadmium Hydroxide Stractan	-	-	-
Vinyl Chloride (chloroethene)	24 Hour	0.010 ppm (26 µg/m ³)	Tedlar Bag Collection, Gas Chromatography	-	-	-
Visibility Reducing Particles	1 Observation	In sufficient amount to reduce the prevailing visibility to less than 10 miles when the relative humidity is less than 70%		-	-	-

ppm - parts per million

µg/m³ - micrograms per cubic meter

mg/m³ - milligrams per cubic meter

(1) CO, SO₂ (1 Hour), NO₂, O₃ and PM-10 Standards are not to be exceeded.

All other Standards are not to be equalled or exceeded.

(2) Not to be exceeded more than once a year.

(3) Annual arithmetic mean

5/90



ERC
Environmental
and Energy
Services Co.

California and Federal Ambient Air Quality Standards

4.3-1

54.6° F. The average daily temperature during the hottest month is about 94° F.

Based on wind data for Ukiah, located approximately 17 miles south of Willits, the annual average wind speed is about 7.6 miles per hour (mph) and wind speeds exceed 12 mph about 10 percent of the time. Wind speeds are calm (less than 1 mph) about 58 percent of the time. Prevailing winds are generally from either the northwest or southeast. Wind data are not collected in Willits.

Overall, the climate of the area can be characterized by hot, dry summers and cool, rainy winters. The climate is subject to both maritime and interior influences and can be described as transitional.

The local climate is strongly influenced by its topographic setting. The hills west of Willits both moderate the maritime influence of the ocean and block much of the summer sea fog from reaching the valley. Cold air drainage from surrounding higher elevations also is heavy during the winter and spring months.

Due to topographical, climatic, and meteorological factors, the Little Lake Valley is subject to air temperature inversion conditions and heavy morning fogs which can prevent dispersion of pollutants emitted from both stationary and mobile sources. Inversion conditions result from subsidence and compressional heating of air during the summer, and from cooling of air near the ground in winter. In both cases, a condition results where air temperature increases with height. This "inversion" of the normal decrease of air temperature with height prevents warm air masses, such as those emitted by industry and automobiles from being buoyant (lighter) than the surrounding cool (denser) air. As a result, if the velocity and temperature at which pollutants are emitted are not high enough, pollutants will be "trapped" in the surrounding warm air, thereby increasing pollutant concentrations. The distance from the ground surface to the base of the inversion layer is commonly called the mixing height. Inversion episodes can typically last a few hours, particularly during the morning hours. Infrequently, they can last several days.

4.313 Ambient Air Quality. Air quality at a given location is a function of several factors, including the amount and type of pollutants being emitted into the air, both locally and regionally, and the dispersion characteristics of pollutants within the region. The major factors affecting pollutant dispersion are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and the topographic and geographic features of the region.

Air quality data for Willits are gathered at a number of monitoring stations in Mendocino County and other localities. Stations in Willits monitor PM₁₀ and total suspended particulates; sulfur dioxide information comes from Vallejo; carbon monoxide and nitrogen dioxide data are gathered in Santa Rosa; and ozone is monitored in Ukiah. Mendocino County has been

designated as attainment for ozone, nitrogen dioxide, sulphur dioxide, and carbon monoxide and is nonattainment for particulate matter with less than 10 micron in diameter. As such, Mendocino County, as part of the North Coast Air Basin monitors and develops strategies to reduce PM₁₀ emission for inclusion in California's SIP. PM₁₀ emissions over the last three years in Willits are summarized in Table 4.3-1.

TABLE 4.3-1: 1989-1991 EMISSION SUMMARY FOR PM₁₀ IN WILLITS

Standard 24 hour: California 50ugm³

Federal 150ugm³

SAMPLING YEAR	NUMBER SAMPLES	AVERAGE	NUMBER OF DAYS			MAXIMUM
			<50ugm ³	>50ugm ³	>150ugm ³	
1989	59	33	50	9	0	83
1990	60	25	56	4	0	63
1991	60	23	37	3	0	87

Source: Mendocino County APCD, 1989, 1990, 1991.

Pursuant to the California Clean Air Act, the Mendocino County APCD also monitors emissions of ozone precursors and works with local agencies to reduce these pollutants.

4.320 Impacts

The following discussion describes the air quality impacts that can be expected as a result of development in Willits with each of the three growth scenarios considered as part of the General Plan Update.

4.321 Construction Impacts. Pollutant emissions associated with construction activities include tailpipe emissions from vehicles and construction equipment and fugitive dust from grading and building activities. Without information regarding the exact types and number of various pieces of construction equipment that will be used, it is not possible to estimate the total pollutants which would be emitted. In general, diesel-powered equipment will emit more NO_x, SO_x and PM₁₀ compared with gasoline-powered equipment. The latter, however, emit more hydrocarbons and CO.

Fugitive dust generation from grading and heavy construction operations is usually estimated at 1.2 tons per acre per month of activity (USEPA, 1985). However, watering and other soil stabilization techniques are routinely employed to substantially reduce the dust generated by land disturbances during construction.

Theoretically, General Plan Scenario #3 which projects the highest number housing units would result in the highest number of total acres under construction and subsequently the highest pollutant emissions from construction. Not enough information is known regarding dwelling units per acre to quantify these impacts. Nevertheless, construction impacts will be localized, transient, and short-term, and can be held below significant levels by employing mitigation measures as appropriate to specific construction projects and described later under Mitigation Measures.

4.322 Vehicular and Residential Impacts. CARB's URBEMIS3 model and the EMFAC7EP vehicle burden mix were used to estimate emissions of the five priority vehicular pollutants due to projected traffic associated with the City of Willits General Plan Update for the year 1990 (existing) and 2020 (buildout). Residential emissions from natural gas heaters and wood stoves were estimated using emission factors from CARB and US Environmental Protection Agency (USEPA). The estimated daily emissions to the region for the three Willits growth rate scenarios are presented in Table 4.3-2.

Mendocino APCD has suggested that emissions from nonregulated sources which are equal or greater than 1 percent of the county's average daily emissions would be considered a significant impact. The estimated additional pollutant emissions from any of the Willits growth scenarios would not constitute a significant impact using this criteria.

In addition to regional emissions, intersections operating at a level of service (LoS) D (indicating substantial traffic delays averaging 25-40 seconds) have the potential to create highly localized CO impacts ("hot-spots") above federal and/or state standards. Based on the traffic analysis prepared by TJKM Transportation Consultants, two signalized intersections (out of a total of three) were estimated to be operating at LoS D or worse in 2020 (at buildout). The intersections of Main Street with Commercial Street and Main Street and State Route 20 would degrade from LoS D to LoS F under buildout conditions. As a result, development according to the proposed General Plan would increase the number of potential CO hot spots in the Willits area from zero to two. This would be a potentially significant impact. However, mitigation measures contained in the circulation section of this report are expected to reduce the buildout LoS at these intersections to D, thereby reducing the significance of projected adverse air quality impacts.

TABLE 4.3-2: ESTIMATED ADDITIONAL POLLUTANT EMISSIONS
(Tons/Day)

	CO	NO _x	SO _x	¹ PM10	² TOG
Scenario 1					
Vehicular	3.98	1.07	.12	.53	.45
Natural Gas ³	.0030	.0122	.0001	.0005	.0008
Wood Stoves ⁴	.0417	.0012	.0002	.0070	.0230
Totals	4.02	1.083	.1203	.538	.474
Scenario 2					
Vehicular	3.89	1.05	.12	.52	.44
Natural Gas	.0024	.0094	.0001	.0001	.0006
Wood Stoves	.0316	.0008	.0002	.0053	.0174
Totals	3.92	1.06	.1203	.525	.458
Scenario 3					
Vehicular	4.4	1.19	.14	.54	.49
Natural Gas	.0023	.0257	.0002	.0009	.0017
Wood Stoves	.0878	.0023	.0005	.0146	.0484
Totals	4.49	1.22	.141	.556	.540
County Emissions (1989 average daily)	85	23	3.2	33 (58) ⁵	25

1. For natural gas emissions, this number represents total particulate matter.
2. For wood stove emissions, this number represents total of methane and non-methane organics.
3. Assumes as worst-case scenario that all new homes in Willits would heat with natural gas.
4. Estimates that 63 percent of rural homes burn 2.6 cords of wood per year (U.S. EPA, 1989).
5. Average daily emissions of total particulates in Mendocino County 1989.

Source: Ogden Environmental 1992; CARB 1989.

4.323 Commercial and Industrial Impacts. Growth in the commercial sector may have air quality impacts, depending on the type of business. Clearly, a manufacturing facility will produce air pollutants specific to its process and emission rates vary greatly among various industries. However, common types of businesses have known effects. For example, gas stations and dry cleaning plants will produce organic gas emissions that will contribute to the region's O₃. It is not possible to quantify commercial and industrial emissions at the General Plan level as actual future uses are not known. Commercial and industrial emissions are regulated by the Mendocino APCD which allows "no net increase" of significant pollutants.

4.330 Mitigation Measures

A number of mitigation measures are available to reduce potential air quality impacts associated with the proposed General Plan; these are listed below.

4.331 The City shall encourage the increased use of public transportation and/or ride sharing.

4.332 The City shall establish criteria in consultation with the Mendocino APCD to determine the significance of air quality impacts of proposed developments in conjunction with environmental review. Such criteria should consider if potential emissions will cause air quality standards to be exceeded, if the proposed project is consistent with the adopted air quality management plan, and if the proposed project would expose sensitive receptors (schools, hospitals, convalescent homes) to substantial pollutant concentrations. Appropriate mitigation measures shall also be required for proposed developments.

4.333 The City shall require builders to use appropriate techniques to minimize pollution from construction activities, such as:

- . minimizing simultaneous operation of multiple construction equipment units
- . using low pollutant-emitting construction equipment
- . using electrical construction equipment
- . using catalytic reduction for gasoline-powered equipment
- . applying injection timing retard to diesel-powered equipment
- . watering the construction area to minimize fugitive dust

4.334 The City shall require builders to use only EPA approved low-emission woodburning stoves for new residential construction and shall encourage retrofitting of existing woodburning stoves to reduce pollutant emissions.

4.400 Noise

4.410 Setting

The existing noise environment of Willits is described in Chapter 5 of the General Plan Technical Appendices (Volume 2). The aforementioned chapter also includes a definition and measurement of noise and a map of the City illustrating existing noise levels. This chapter of the EIR provides a discussion of the methods used to reduce noise impacts and a list of mitigation measures designed to address the noise impacts of the General Plan revision.

Major noise sources in Willits include U.S. 101, the Northwestern Pacific, Eureka Southern and California Western railroad tracks and the City's industrial land uses, comprised primarily of sawmills and wood products factories. Daytime ambient noise levels within the City limits have been measured in the range of 45 to 64 decibels with the highest measurements taken in proximity to U.S. 101. Descriptive data pertaining to the community noise environment are presented in Chapter 5.000 of the General Plan Technical Appendices.

4.420 Impacts

In the future, neither the railroads nor the forest products industry are expected to generate noise in excess of their present levels; thus the primary source of future noise increases is likely to be vehicle traffic generated as a result of approved commercial and residential development. In addition, to the extent that the City is successful in attracting new industries, increased community noise could result.

Based on the growth assumptions and mitigation measures associated with the preferred growth scenario and roadway network alternative, the existing 60 dBA noise contour along U.S. 101 is expected to be reduced by 25 feet north of Commercial Street and by 10 feet south of State Route 20. The most significant noise impacts can be expected to occur between Commercial Street and State Route 20, where the 60 dBA noise contour could widen by as much as 90 feet.

Regarding increases in vehicle traffic, it should be pointed out that the proposed U.S. 101 bypass will result in fewer trucks along Main Street, even with the growth assumed under the preferred scenario. This is because truck traffic will be rerouted onto the bypass. Since the traffic study on which the noise analysis is based does not take into account

differences in vehicle types, or the fact that truck traffic (up to 20 percent of the total) will be rerouted onto the bypass, measured noise levels along this segment could be lower than is projected upon completion of the U.S. 101 bypass.

In terms of the future attraction of industry, most of the City's designated industrial sites are located a safe distance from noise-sensitive land uses. Increased noise at these locations should not, therefore, be problematical. There are, however, some properties zoned for manufacturing in proximity to Blosser Lane Elementary School. Special noise attenuation techniques may prove to be necessary at these locations.

With regard to the estimated noise impacts of the alternative growth scenarios, higher noise levels along Main Street could be expected under Alternative 2 since the U.S. 101 bypass would not be built, resulting in increased automobile, motorcycle and truck traffic along this roadway. Noise levels in other parts of the City would generally be lower under Alternative 2 in view of its lower estimated growth rate. Alternative 3 would result in higher noise levels throughout the community than would be the case under the preferred growth scenario.

4.430 Mitigation Measures

In situations where the range of noise levels is higher than that considered normally acceptable for a specified land use type, it may be possible to reduce the effective noise level to achieve better compatibility. Each site has its own characteristics and problems, thus mitigation measures which are effective for one project may not apply to another. For this reason, it is not appropriate to predetermine the method by which noise levels should be reduced or controlled throughout the community. Regardless of the mitigation measure or combination of measures which is used, it is almost always less costly to include the mitigation in the design phase rather than dealing with the problem later.

The measure or combinations of measures that can be used to mitigate noise fall into four general categories:

1. Site Planning
2. Architectural Treatment
3. Noise Barriers
4. Construction Modification

Site Planning. By taking advantage of the natural shape and contour of sites it is often possible to orient buildings and other uses in a way that will reduce or eliminate noise impact. Cluster development is conducive to noise reduction. The ways in which site planning can be used to reduce noise impacts are as follows:

- . Increase the distance between the noise source and the receiver.
- . Place non-noise-sensitive land uses (parking lots, maintenance facilities, utility areas) between the source and the receiver.
- . Use non-noise-sensitive structures (garages) to shield noise sensitive areas.
- . Orient buildings so outdoor areas are shielded from noise.

Architectural Layout. By attention to the types of uses being accommodated in a structure, the noise-sensitive uses can be moved to the quiet side of the building. Some typical examples are listed:

- . Put bedrooms on the side of the house farthest from roadways.
- . Do not locate outdoor balconies facing major roadways.
- . Design U-shaped buildings to shield patios.

Noise Barriers. Solid barriers between the noise source and the noise-sensitive area block out sound waves. The minimum acceptable surface weight for an effective noise barrier is 4 pounds per square foot (equivalent to 3/4 inch plywood) with no cracks or openings. To be effective the barrier must interrupt the line of sight between the noise source and the receiver. Noise barriers are created by topographical features in some situations. Earth berms can be created by grading to achieve the same result. It should be noted that short barriers are not effective regardless of height because sound waves will pass around the end of them and still reach the receiver. This effect, called flanking, can be minimized by bending the wall or barrier back from the noise source at the ends of the barrier.

Construction Modification. Indoor noise levels due to exterior noise sources can be controlled by the noise reduction characteristics of the building's shell. In general, windows and doors are the weakest links in the acoustic skin of a building. The amount of insulation and sealing required depends on the amount of noise reduction required. The following approaches may be considered:

- . Use solid core doors having an acoustic door gasket.
- . Use double paned glass or gasketed window systems.
- . Add insulation material to walls, ceilings and floors.

Specific mitigation measures designed to address the noise impacts of the Willits General Plan Revision are listed below.

4.431 Require site-specific noise assessment by a qualified acoustical consultant and acceptable mitigation of estimated noise impacts for all commercial and industrial development proposed in proximity to noise-sensitive land uses.

4.432 In the interim period prior to the completion of the U.S. 101 bypass, interior noise levels should be measured at Willits High School and Howard Memorial Hospital. If the average interior noise level at either of these locations is found to be in excess of 45 dBA, appropriate noise attenuation techniques should be implemented.

4.433 On completion of the U.S. 101 bypass, load limits shall be established on Main Street between State Route 20 and Commercial Street to reduce truck traffic on this portion of the roadway.

4.434 In the event that complaints about noise increase in the future, the City shall consider adoption of a noise control ordinance.

4.500 Soils/Geology/Seismicity

4.510 Setting

Little Lake Valley is located in an area of the coast range province known as Mendocino Highlands. The Mendocino Highlands are characterized by discontinuous and independent ridges and isolated valleys with a general north-northwest trend, sub-parallel to the coastline farther west. The rugged topography is a manifestation of the region's geologic structure and active tectonic history. Elevations of the highest peaks exceed 3,500 feet with elevations of some valley floors below 600 feet. Most of the region is underlain by a complex terrain of slightly metamorphosed grawacke sandstone, conglomerate, shale, schist, chert and serpentinite representing marine rocks. Erosion has produced large volumes of sandy and gravelly sediments that were deposited in the main valleys. Subsequent erosion has produced a series of terrace deposits that occupy the bottoms of many valleys. The City of Willits is located in the western portion of Little Lake Valley at an elevation of roughly 1300'. It is a relatively level area of alluvial deposits with heterogeneous and discontinuous layers of clays, silty, sand and gravel several hundred feet deep. Soils vary from well drained to poorly drained.

Faults judged capable of developing earthquakes that could generate strong ground shaking (greater than 0.05 gravity) in Willits are the San Andreas, Maacama and Healdsburg faults, and the Konocti Bay fault zone. The Maacama fault runs through Little Lake Valley. The San Andreas fault system is considered capable of generating major earthquakes (greater than 6.0 Richter magnitude) and has the potential to generate a "great earthquake" (greater than 8.0 Richter magnitude). The portion of the San Andreas fault between Cape Mendocino and San Francisco experienced up to 20 feet

of displacement during the great 1906 (San Francisco) earthquake. Recurrence of great earthquakes is estimated to be about 100 years and major events may recur every 5 to 15 years.

4.520 Impacts

The City is potentially susceptible to the effects of seismic shaking, liquefaction, ground lurching and rapid consolidation or compaction of underlying soil materials and to the fire hazards caused by such forces. To the extent that implementation of the revised General Plan leads to population growth, exposure of new residents to seismic risks may be regarded as a significant adverse impact.

The principal seismic impact from an earthquake will be strong ground shaking and shaking-induced ground failures (liquefaction and related ground failures). The nature of ground shaking at the site during an earthquake will be dependent on the following major factors: (1) epicentral distance from the site; (2) magnitude of the earthquake; (3) duration of strong ground shaking; and, (4) local soil, rock and groundwater conditions. A more extensive discussion of seismic safety concerns in relation to regional geologic conditions is included in the Community Safety Appendix (Volume 2, Chapter 9).

4.530 Mitigation

4.531 The California Division of Mines and Geology has prepared a map designating special studies zones in accordance with the Alquist-Priolo Special Studies Act. Developers whose project sites are within special studies zones must demonstrate that the sites are not threatened by surface displacement. For development within the zone, the General Plan requires that geologic, seismic and soil analysis be prepared at the applicant's expense by licensed engineers approved by the City. The Community Safety Map (Volume 2, Exhibit 9-1) illustrates the portions of the City which fall within the special studies zone.

4.352 The General Plan prohibits the development of structures designed for human occupancy within 50 feet of mapped fault traces.

4.353 All new construction is required to meet minimum seismic safety standards.

4.600 Hydrology

4.610 Setting

Little Lake Valley and its watershed occupy about 75 square miles within the inner coast mountain range of Mendocino County. The valley is situated immediately north of the drainage divide between the Eel and Russian River basins. The valley, with elevations ranging from 1,325 feet to 1,500 feet, slopes gently from south to north and is surrounded by steep foothills rising 1,000 to 1,500 feet above the floor. Several streams, including Haehl, Baechtel, Davis, Broaddus and Willits Creeks flow north through the valley, where they converge at the north end in a poorly drained, marshy area to form Outlet Creek, a tributary of the Eel River.

The confluence of Baechtel and Outlet Creeks, located some four miles north of the City, comprises the major drainage of Little Lake Valley and as such, receives and controls storm runoff valley-wide. Because of the unique, localized geologic formations at the confluence, backwaters, reducing valley runoff flows, are formed. This causes some areas to flood during moderate to heavy storm conditions. The reduced drainage velocities at the Baechtel-Outlet confluence have encouraged stream siltation in the valley's drainage network, which acts to aggravate flooding problems. Further, many of the channels, particularly Baechtel Creek, are partially clogged with brush and debris which, together with channel siltation, reduces drainage efficiency area-wide. Recent City efforts have significantly reduced the amount of brush and debris in local waterways.

Widespread flooding is not a major problem in Willits although there are some localized flood problems. The Federal Emergency Management Agency (FEMA) has designated limited areas in Willits where 100-year flood inundation would be expected (Exhibit 9-1).

Flood problems in Willits generally relate to localized flooding along creeks with flow blockages, or to capacity limitations of storm drainage systems. Rather than simple flooding, problems are more likely to be caused by interaction of runoff with sediment. Streambank erosion is a significant issue, since streambank failures can lead to localized flooding if they block the stream channel. Similarly, hillside runoff is intertwined with the processes of erosion and landsliding.

Water from the Davis Creek Watershed is impounded, treated and distributed throughout the City. Approximately 60,000 acre-feet of ground water is available in Little Lake Valley; however, the recharge rate is only 10,000 acre-feet per year. The City owns 3000 acres in the vicinity of the local watershed.

4.620 Impacts

Development in accordance with the preferred growth alternative would result in an estimated 33% increase in water consumption, resulting in a

total consumption of approximately 1550 acre-feet per year. 1310 acre-feet are impounded in two reservoirs. These reservoirs are used during the dry season. During the wet season, when water flows plentifully, water is drawn from Davis Creek. Because half the year's demand is satisfied by the creek, the City is able to meet it's demand and reserve about 50% capacity in storage; but at buildout capacity prolonged drought conditions would diminish the reservoirs rapidly. Water services are adequate at this time but will require careful monitoring as development approaches buildout in the year 2020. For further detail on water services see Section 11.100 under Public Services and Facilities.

In addition to higher water consumption, an increase in wastewater volume of roughly the same magnitude can be expected to result from General Plan implementation. It is also possible that increased exposure of people to flood risks could occur, depending upon the nature and location of future development.

4.621 Mitigation

4.621A Potential threats to people or aquatic life, whether issues of water quality or quantity, are addressed by the Mendocino County Health Department on a regular basis.

4.621B Water saving devices, including low flow toilets and shower heads and drought-resistant landscaping, shall be required for all new development.

4.621C Enact a \$500 per unit surcharge on new residential development to be earmarked toward eventual water treatment plant expansion.

4.621D Expand the capacity of the City's wastewater treatment facility to 2.3 million gallons per day.

4.621E Rehabilitate the existing sewer system to reduce infiltration and inflow.

4.621F The Willits General Plan Safety Map shows the Federal Flood Insurance Rate Map designations for floodway zones. These zones are subject to restricted development which adequately prevents significant hazards or material damage.

4.700 Biological Resources

4.710 Setting

Willits is located on the western periphery of Little Lake Valley, which lies between two major ridge systems of Mendocino County. The visual quality and character of the City are largely attributable to these land forms as well as the more local hills, ridges, stream corridors and undeveloped open spaces and the different biological communities they support.

Because of its location and the intensity of existing urban development, the incorporated portion of Willits does not contain as broad a diversity of plants and wildlife as the lands which surround it. The Natural Diversity Data Base (NDDDB), published by the California Department of Fish and Game, lists only one rare species as having been observed within the City limits. Baker's Meadowfoam (*Limnanthes Bakeri*), a plant which is classified as rare, has been identified on numerous occasions in the northernmost portion of incorporated Willits, along the east side of U.S. 101. Immediately northeast of the City limits a large stand of Valley Oak Woodland has been observed. Although Valley Oak Woodland is not listed as rare or endangered under federal or state law, it is generally regarded as a habitat of concern. Other key habitat areas found in the vicinity of Willits include coastal prairie grassland, mixed evergreen forest and riparian woodland. Flora and fauna supported by these habitat areas are listed in Chapter 6.000 of the General Plan Technical Appendices (Volume 2).

The absence of a large number of NDDDB listings associated with Willits does not necessarily mean that no rare or endangered species exist within the City limits; it simply means that few such observations have been recorded and submitted to the data base. The Conservation and Open Space Appendix lists five additional species which, though not NDDDB listed, are regarded as endangered or threatened by the Smithsonian Institute and are believed to exist in the vicinity. In addition to federal and state listed endangered plants and animals, Willits has a number of species and habitat areas which are worthy of preservation. Heritage trees and the biotic resources they support are a case in point. Riparian corridors along the various streams which traverse the City are also worthy of further study and appropriate preservation efforts.

4.720 Impacts

Possible biological impacts associated with future development in accordance with the preferred General Plan growth scenario include loss of sensitive plant communities, heritage tree removal and damage to existing riparian corridors. The proposed east side U.S. 101 bypass poses a potential threat to the previously mentioned Baker's Meadowfoam, depending upon the ultimate alignment of the roadway in relation to the location of the plant. Development in accordance with the Revised General Plan could also result in substantial tree removal, in the absence of ameliorative policy mechanisms. Finally, development along existing creeks and streams could adversely effect riparian plants and wildlife relying upon such streams for habitat area. Proposals to provide improved vehicular access to Brook-trails are of particular concern in this regard, since several of the alternatives being considered would require construction in close proximity to riparian habitat. Effective mitigation measures are required in order to address these possible biological impacts.

In terms of the alternative growth scenarios, biological impacts would be much more severe in the case of Alternative 3, which would result in the virtual buildout of all existing lands suitable for development. In such a case, it would be difficult to mitigate biological impacts by scaling back development, in view of the high growth rate assumed. Alternative 2, by contrast, could have a somewhat lesser impact on the City's biological resources, since a much smaller amount of land would be developed, enabling the City to preserve more areas regarded as biologically sensitive. On balance, if the mitigation measures contained in this report are adopted, development can occur in accordance with the preferred growth scenario without unacceptably adverse impacts on plants and wildlife.

4.730 Mitigation Measures

4.731 Site-specific environmental review of all residential, commercial and industrial development proposals shall be required; extra scrutiny shall be given to projects along riparian corridors and in areas containing Valley Oak Woodland or other habitats or species of significance.

4.732 Field investigation by a qualified botanist should be conducted in relation to the proposed U.S. 101 bypass to ensure that its ultimate alignment will not pose an unmitigable threat to the Baker's Meadowfoam located east of the existing roadway in the northern part of the incorporated city.

4.733 The City shall pass, by December 1993, an ordinance calling for the preservation of Valley Oaks and other trees of significance.

4.734 City planning staff shall closely review all proposals for improved vehicular access to Brooktrails and provide written comments to the lead agency to ensure that the impacts of the project on riparian habitat are effectively mitigated.

4.735 Revegetation of sites using native species may be required as a condition of approval for development projects.

4.736 The City shall conform to the California Department of Fish and Game policy of no net loss of wetlands in the review of proposed development projects.

4.800 Visual Character

4.810 Setting

The visual and aesthetic character of Willits is an environmental attribute which should not be diminished as a result of future development. The wooded ridgelines which surround Little Lake Valley, the trains which traverse the valley floor and wind into the mountains, the riparian corri-

dors which extend into the City itself and the mature trees which predominate throughout the planning area are all aspects of the visual environment worthy of substantial preservation efforts.

At the same time, however, it must be acknowledged that the City's history of industrial, commercial and residential development has left an imprint on its existing visual environment. Lumber mills, factories, abandoned industrial sites, dilapidated residences and mobile home parks, and poorly maintained commercial buildings have combined to create visual blight in some portions of the community. In addition, therefore, to having many visual attributes worthy of preservation, the City also has a need for enhancement of its visual environment in some areas.

4.820 Impacts

The visual impacts of future growth anticipated under the Revised General Plan will depend upon the nature and location of development which actually occurs, and are therefore difficult to precisely estimate. In some portions of the community, development will actually serve to enhance the visual environment. In other cases, development proposals may have to be modified as a condition of approval in order to minimize adverse visual impacts. Given the subjective nature of the aesthetic experience, some degree of visual disturbance on the part of some residents is probably unavoidable. The key is to utilize the application review process to mitigate the most visually offensive aspects of proposed projects.

4.830 Mitigation Measures

4.831 Utilize the policies contained in the Conservation and Open Space Element to preserve and enhance the City's existing visual environment.

4.832 Encourage projects which clearly enhance the visual characteristics of the site and the surrounding area.

4.833 Utilize the application review process to seek modifications in proposed plans which negate the adverse visual impacts or enhance the visual attributes of proposed development projects.

4.834 Preserve trees and other significant visual features through enforcement of existing ordinances and enactment of new ordinances where appropriate.

4.900 Historical and Archaeological Resources

4.910 Setting

Section 10.000 of the General Plan Technical Appendices (Volume 2) contains an inventory of the City's existing historical resources and an

identification of areas which are of potential archaeological significance. Settlement in the vicinity of Willits began in the mid-1880s; evidence suggests that several homesteads existed in the area by 1859. Historic sites in Willits include the Skunk Train, the Irvine and Muir Company building at 212 South Main Street and the Willits Carnegie Library at 85 East Commercial Street.

With regard to prehistoric resources, Willits is located in an area of high archaeological sensitivity. Four prehistoric sites have been recorded just outside of the City limits. Because of the area's rich native American ancestry, there is a strong probability of prehistoric cultural resources within the project area.

4.920 Impacts

Development in accordance with the provisions of the Revised General Plan could have an adverse impact on local historical and archaeological resources. Potential adverse impacts on historical resources include encroachment on views of existing historic structures or diminution of their architectural significance by incompatible new construction. Of greater concern is the potential for disturbance of archaeological resources resulting from residential, commercial or industrial development in sensitive areas. Potential impacts of this nature should be identified at an early stage of the project planning process, with acceptable mitigation included as part of the project or required as a condition of approval.

4.930 Mitigation Measures

4.931 Review of development projects in the vicinity of historic sites noted on the Historical and Archaeological Resources Map (Exhibit 10-1, Volume 2) shall include consideration of visual and architectural impacts on existing structures of historical significance.

4.932 Project review by the California Archaeological Inventory (CAI) shall be required as part of the application for development projects in potentially significant areas shown on the Historical and Archaeological Resources Map. If the project review indicates a likelihood of significant archaeological resources in the area proposed for development, field observation by qualified archaeological personnel shall be required. All necessary archaeological analysis shall be conducted at the expense of the applicant.

5.000 TOPICAL ISSUES

5.100 Unavoidable Adverse Impacts

Although the environmental impacts of the General Plan Revision can be mitigated to an acceptable level by the measures contained in this report, there are likely to be some unavoidable adverse impacts associated with plan implementation. These impacts will manifest themselves primarily in the form of increased motor vehicle utilization and its associated traffic, pollution, noise and fossil fuel consumption. While these impacts can be minimized by adherence to the mitigation measures contained in this report, it is unlikely that they can be entirely avoided.

Scenario 3 would be the most severe of the alternatives studied in terms of unavoidable adverse impacts. Scenario 2 would result in very minimal impacts in this regard, given its low growth assumptions. The preferred growth scenario, if adopted in conjunction with the mitigation measures contained in this report, would have the effect of limiting unavoidable adverse environmental impacts to an acceptable level.

5.200 Growth Inducing Impacts

Given the geographic characteristics of Willits in relation to the dynamics of population and economic growth in northern California, substantial growth can be expected to occur in the Willits area with or without the passage of a revised General Plan. The General Plan Revision simply gives the City an opportunity to define the level of future growth that is desired and to direct growth to appropriate locations within the planning area. The preferred growth scenario would have the effect of managing and directing growth which is likely to occur in the future, as opposed to inducing growth that would not occur in the absence of a revised General Plan. Only by adopting a more rapid growth scenario and by enacting and implementing the policies necessary to achieve such a scenario would the City be acting to induce future population and household growth.

5.300 Cumulative Impacts

The amount of future population and household growth postulated for Willits under the revised General Plan must be considered in conjunction with development likely to occur elsewhere in the planning area. In addition to Willits, substantial growth is expected to occur in Brooktrails Township. Table 5-1 provides estimates of combined population and household growth in Willits and Brooktrails under the preferred growth scenario and two other alternatives.

The mitigation measures contained in this report are designed to acceptably offset the cumulative adverse environmental impacts of area-wide growth anticipated under Scenario 1. Under Scenario 2, cumulative environmental impacts would be substantially less severe, possibly reducing

the need for some of the mitigation measures contained in this report. By contrast, should future growth occur at the level postulated under Scenario 3, the measures contained in this report could prove insufficient to adequately offset cumulative adverse environmental impacts.

TABLE 5-1: ESTIMATED INCREASES IN POPULATION AND HOUSING UNITS
IN WILLITS AND BROOKTRAILS, 1990-2020

SCENARIO	<u>CITY OF WILLITS</u>		<u>BROOKTRAILS</u>		<u>CUMULATIVE INCREASE</u>	
	POPULATION INCREASE	HOUSING INCREASE	POPULATION INCREASE	HOUSING INCREASE	POPULATION INCREASE	HOUSING INCREASE
1	2,478	826	7,184	2,763	9,662	3,589
2	1,853	636	762	293	2,615	929
3	5,217	1,739	12,165	4,169	17,382	6,418

Source: City of Willits Estimates from Volume 2, Section 2.000 of Willits General Plan Revision. Brooktrails estimates from Brooktrails Access Study, TJKM Associates, May, 1991

The effect of requiring site-specific analysis and acceptable mitigation of traffic, air quality, noise and other environmental impacts on a project-by-project basis will be to limit aggregate growth within the City limits to the levels estimated under the preferred growth scenario. Projects which would result in growth in excess of Scenario 1 are highly unlikely to be mitigable to an acceptable level. Outside of the City limits, infrastructure constraints will prevent growth from occurring beyond the levels assumed under the preferred scenario.

5.400 Relationship Between Short Term Uses of the Environment and Enhancement of Long Term Productivity

The overall effect of the revised General Plan will be to enable future growth to occur in a manner which will minimize adverse environmental impacts. As indicated in Section 5.100, however, some degree of adverse impact is probably unavoidable, in light of the City's need to promote tax-generating population and economic growth. In this limited sense, there is a trade-off of short term economic growth at some long term environmental cost. This trade-off is acknowledged and accepted as a matter of policy. To restrict growth to a level at which absolutely no adverse

environmental impacts would occur would have disastrous fiscal consequences, given the City's dependence upon sales tax revenue. The degree of environmental impact associated with implementation of the revised General Plan, while perhaps significant, has been determined to be acceptable in the context of the City's overall economic, social and fiscal objectives.

5.500 Significant Irreversible Environmental Changes Resulting from Project Implementation

To the extent that they cannot be mitigated by measures contained in this report, cumulative air quality, traffic and noise impacts constitute significant irreversible environmental changes associated with plan implementation. Consumption of fossil fuels in the construction and operation of planned residential, commercial and industrial land uses is another form of irreversible environmental change. Perhaps most significantly, future growth in accordance with the revised General Plan will result in a slow, but significant evolution in the character of the community. Although the average annual growth rate posited under the preferred scenario is not high, the cumulative effect of a 50 percent population increase over the duration of the planning period could irreversibly alter the City's small town rural character. Under the slower growth alternative (Scenario 2), deterioration of community character would be less pronounced, while under the more rapid growth alternative (Scenario 3), the City would lose its small town character more rapidly and noticeably.

6.000 ALTERNATIVES

Throughout this report, three alternative growth scenarios have been analyzed. These three scenarios, discussed in detail in the Summary of General Plan Issues found in Volume 2, represent existing growth tempered by site development constraints (Scenario 1); reduced growth (Scenario 2); and increased residential, commercial and industrial development (Scenario 3). In addition to these three alternatives, state environmental law requires that a "no project" alternative be analyzed, as well as the possibility of similar development occurring at another location. These alternatives are discussed below along with an assessment of the effects of unlimited growth and growth under existing zoning requirements.

6.100 Existing Zoning

Both Scenarios 1 and 2 are largely consistent with existing land use laws and zoning policies. Neither alternative proposes significant changes in land use classifications or zoning designations. The primary difference between these scenarios and continuance of growth under existing zoning would be that the total number of units approved would be substantially lower as a result of the site-specific identification and mitigation of environmental impacts required under the revised General Plan EIR. Scenario 3, if implemented, would result in higher levels of commercial and

multi-family residential development than would be foreseen under existing zoning conditions.

6.200 "No Project" Alternative

The impacts of a "no project" alternative would be similar in scope to the effects of continued growth under existing zoning. An important consideration, however, is the fact that the mitigation measures contained in this report would not be applicable. Consequently, the amount of future growth and its associated environmental impacts would probably be greater under a "no project" alternative than under the preferred growth scenario of the revised General Plan.

6.300 Unlimited Growth

Unlimited growth, while perhaps regarded as desirable to some segments of the community, would have disastrous impacts on the City of Willits and surrounding areas. Roadway congestion and related noise and air pollution levels would soon reach unacceptable proportions. More significantly, unrestricted development at environmentally sensitive locations without acceptable mitigation of adverse impacts would imperil the environment of Willits and the larger planning area. Finally, unlimited growth would place an undue strain on existing public facilities and service delivery systems. All of these factors suggest that unlimited growth is an unacceptable alternative for the City of Willits.

6.400 Development at Another Location

At other locations in Mendocino County and the surrounding area, planned development will occur at a more rapid pace than is planned for the City of Willits. Many of these locations are less constrained by environmental limitations and can, therefore, sustain higher growth levels. Within this context, the growth postulated under the revised General Plan might be directed to other presumably more suitable areas. Alternative locations for future urban growth include the Santa Rosa/Cloverdale corridor, the Fairfield/Vacaville area in Solano County and accelerated redevelopment of existing urban centers such as Petaluma, Fort Bragg and Ukiah.

Each of the above alternative locations, however, has its own set of constraints which could limit future growth. The Santa Rosa/Cloverdale corridor is developing serious traffic congestion problems; the Fairfield/Vacaville area has unresolved growth management concerns and existing urban centers are either congested and lacking in affordable housing opportunities, or geographically isolated with respect to major growth corridors. Moreover, given the adoption of Scenario 1 as the preferred growth alternative, sufficient capacity exists to accommodate the level of growth projected. It is therefore unnecessary from a policy standpoint to direct future growth elsewhere.

7.000 PERSONS AND AGENCIES CONSULTED

Bank of Willits

Brooktrails Township

California Archaeological Inventory - Northwest Information Center

California Department of Transportation

California Department of Fish and Game

California Regional Water Quality Control Board

Little Lake Fire Protection District

Mendocino County Department of Planning

Ogden Environmental and Energy Services Company

Pacific Gas and Electric

Selzer Realty

Willits Chamber of Commerce

Willits Community Services

Willits Environmental Center

Willits Police Department

Willits Water Department

8.000 MITIGATION MONITORING PROGRAM

IMPACT	MITIGATION	MONITORING ACTION	RESPONSIBILITY	TIMING
Increased local traffic	. Require traffic impact studies for projects generating 50 or more peak hour vehicle trips	Review and approve traffic study	City Council	Prior to project approval
	. Traffic impact fees	Adopt, implement fee ordinance	City Council/ Community Development Director	Adopt by 12/92; implementation ongoing
Reliance on single occupancy vehicles	. Bicycle safety Route	Disseminate information	Community Development Director	Ongoing
	. Study feasibility of MTA extension	Conduct study	Community Development Director	By 12/95
	. Require bicycle storage areas for commercial and multi-family uses	Site observation to verify installation	Building Official	Prior to issuance of certificate of occupancy
	. Require pedestrian/bicycle pathways	Site observation to verify installation	Building Official	Prior to issuance of certificate of occupancy
	. Require park and ride lots for subdivisions of 50 or more units	Review plans, site observation to verify installation	Building Official	Prior to issuance of building permits

IMPACT	MITIGATION	MONITORING ACTION	RESPONSIBILITY	TIMING
Main Street congestion	. Load limits on Main Street	Post, enforce load limits	Police Department	Following bypass completion
	. Intersection improvements	Monitor intersection LoS; implement improvements at LoS F	Community Development Director	Ongoing
Air pollution	. Encourage public transportation/ridesharing	Implement programs to reduce single occupancy vehicles	Community Development Director	Ongoing
	. Establish significance criteria.	Work with APCD	Community Development Director	Ongoing
	. Allow only EPA-approved wood-burning stoves	Field observation of completed units	Building Official	Prior to issuance of certificate of occupancy
Fugitive dust from construction	. Require use of pollution minimization techniques by builders	Field observation of construction sites	Building Official	During construction
Noise generation	. Site-specific noise assessment for commercial/industrial uses proposed near sensitive land uses	Review noise assessment	Community Development Director	Prior to project approval
	. Adopt noise control ordinance if complaints increase	Review/tabulate noise complaints	Community Development Director	Ongoing

IMPACT	MITIGATION	MONITORING ACTION	RESPONSIBILITY	TIMING
Threats to seismic safety	. Geotechnical studies required for projects within seismic zone	Review geotechnical reports	City Engineer	Prior to project approval
	. Prohibit structures within 50 feet of mapped fault traces	Site-specific field observation	Building Official	Prior to issuance of certificate of occupancy
	. All construction must meet minimum seismic safety standards	Site-specific building inspection	Building Official	Prior to issuance of certificate of occupancy
Increased water consumption	. Require water saving devices	Field inspection to verify installation	Building Official	Prior to issuance of certificate of occupancy
	. Surcharge for water plant expansion	Enact, collect surcharge	City Council	by 12/92
Diminished water quality	. Expand capacity of wastewater treatment facility	Monitor existing plant capacity; initiate expansion when needed	Wastewater Treatment Plant Operator	Ongoing
	. Rehabilitate existing sewer system	Install, field check improvements	Public Works Director	1995

IMPACT	MITIGATION	MONITORING ACTION	RESPONSIBILITY	TIMING
Damage to natural habitats	. Site-specific environmental review	Review and revise environmental studies	Community Development Director	Prior to project approval
	. Study bypass alignment to avoid threats to Baker's Meadowfoam	Review biological field studies	Caltrans	Prior to selection of preferred alternative
	. Tree Preservation Ordinance	Enact and enforce Ordinance	Council enacts; Community Development Director enforces	Enactment December 1993; Enforcement ongoing
	. Minimize impacts of Brooktrails access road in riparian habitat	Study alignment alternatives; make recommendations to Brooktrails	Community Development Director	Ongoing
	. Revegetation of sites where appropriate	Impose, enforce revegetation as condition of approval	Community Development Director	Prior to project approval
	. No net loss of wetlands	Prepare wetlands delineation and submit to ACOE and DFG where indicated by preliminary studies	Community Development Director	Prior to issuance of building permits

IMPACT	MITIGATION	MONITORING ACTION	RESPONSIBILITY	TIMING
Visual deterioration	. Review visual impacts as part of application process	Propose modifications where appropriate; review revised plans	Community Development Director	Prior to project approval
Damage to cultural/historical resources	. Scrutinize projects in the vicinity of historic sites	Propose modifications, review revised plans	Community Development Director	Prior to project approval
	. Require CAI inventory for projects in sensitive areas	Review CAI report; require field research if necessary	Community Development Director	Prior to project approval

9.000 RESPONSES TO COMMENTS

9.100 Letter From Brooktrails Township, April 23, 1992

Under Section 15086(a)(3) of CEQA, Brooktrails is entitled to receive notice of the EIR.

The section cited does not address noticing; it merely states that the Lead Agency shall "consult with and request comments on the Draft EIR from local agencies which exercise authority over resources which may be affected by the project." The Lead Agency's use of Brooktrails' traffic consultant for the EIR traffic study, its receptivity to comments offered by Brooktrails at the April 15, 1992 public hearing, and its review and response to Brooktrails' written comments are sufficient to meet the requirements of this section. Since Brooktrails does not meet the definition of a "Responsible Agency" set forth in Section 21069 of CEQA, the noticing provisions of Section 15082(a) do not apply in this case.

Section 21092.5(a) of the Public Resources Code requires a written response to comments made by a public agency at least ten days prior to the certification of an Environmental Impact Report

To address this matter and other concerns which have been expressed regarding process, the City Council voted to extend the public review period by 45 days. This will allow the Council and Brooktrails to review the response to comments in detail.

Brooktrails has not been adequately consulted on circulation matters.

In response to the Township's April 15, 1992 request for further consultation, the Willits City Council directed the consultant to delete the preferred freeway bypass interchange option from the Plan, pending further consultation with Brooktrails and Caltrans. Additional meetings with Brooktrails were held following the extension of the public review period in an effort to address the concerns of the Township.

The Willits Traffic Advisory Committee was ignored.

Although the Traffic Advisory Committee had not been created at the time the work plan for the General Plan Revision was developed, special provisions were made to incorporate the input of this committee. The General Plan consultant had two separate meetings with the Traffic Advisory Committee and the traffic consultant met with the Committee once. As a direct result of input from this Committee, the traffic analysis was expanded to include twelve different circulation network alternatives. Also as a result of input from the Traffic Advisory Committee, provisions for a bicycle safety route, bicycle storage facilities, park and ride lots and expanded MTA bus service were included in the Plan. Some of the suggestions of the Traffic Advisory Committee were not included in the Plan, among them the Upp Creek interchange and the suggestion for a north-south

roadway running parallel to Main Street. These proposals were examined in detail by the consultant, who provided a critique of both proposals at the March 26, 1992 joint study session of the City Council and General Plan Steering Committee. The fact that all of the Traffic Advisory Committee's suggestions were not incorporated into the Plan does not mean that the committee was ignored.

Public participation in the General Plan Revision process was inadequate.

The City went well beyond the minimum provisions of the law regarding public participation. Mechanisms by which public participation was incorporated into the process included a mail survey, which was responded to by 417 area residents; a series of four public workshops organized on a topical basis, each of which was attended by 15-25 participants; establishment of an 11-member General Plan Steering Committee, which met several times to provide input on the work plan; interaction with the Traffic Advisory Committee (discussed previously) and two duly noticed public hearings at the City Council level. Moreover, the public review period was extended by 45 days, to allow for additional input from the citizenry.

The EIR is not thorough or comprehensive enough to be utilized as a Program EIR

The General Plan EIR provides base data and buildout estimates for traffic, air quality, noise, population and housing which can be utilized in the environmental review of subsequent development projects proposed in consistency with the Plan. Site-specific data will be required on a project-by-project basis for biological resources, geology and seismicity, hydrology, cultural and archaeological resources and other environmental factors not adequately addressed by the General Plan EIR. In no case will subsequent development plans be approved in the absence of adequate environmental documentation.

Differences in wording exist between policies and implementation measures in Volume I and mitigation measures identified in Volume III

Since no specific examples are cited, it is impossible to respond to this contention.

Project area should include Brooktrails and the Willits Sphere of Influence

LAFCO is presently in the process of drafting guidelines for local Sphere of Influence Plans. The process tentatively being developed by LAFCO is quite extensive and falls beyond the scope of the General Plan Revision work plan. Given that the LAFCO guidelines are still in draft form and that, therefore, the specific requirements of local Sphere of Influence Plans have not yet been determined, it would be advisable to prepare a Sphere of Influence Plan subsequent to the adoption of the General Plan and the finalization of the LAFCO guidelines. Issues associated with Brooktrails growth are an appropriate component of this future study.

The General Plan does not provide the possibility of creating sufficient employment for the projected increase in Brooktrails families.

Most of the policies contained in the General Plan are geared toward employment generation. Moreover, the Plan identifies sufficient lands designated for commercial and industrial use to provide employment for future Willits and Brooktrails residents. While the City cannot guarantee that such jobs will materialize, the policies contained in the General Plan commit the City to maximizing future employment growth.

Assumptions contained in the Plan regarding future Brooktrails population growth are unsupported.

Brooktrails growth estimates employed by the Plan were derived from the draft Brooktrails Access Study and represent the mid-range of growth scenarios presented therein. Since by actively pursuing a reservoir, two additional access roadways and other infrastructure improvements, Brooktrails has shown every intention of maximizing its future growth, the mid-range forecast included in the Plan seems to be a reasonable estimate for Brooktrails growth to the year 2020.

The DEIR lacks information concerning the environmental implications of facilitating local growth in Brooktrails.

The traffic, air quality and noise data cited by the DEIR and the resulting mitigation measures all incorporate Brooktrails growth assumptions and provide mechanisms for reducing adverse growth impacts to an acceptable level.

Impacts of the airport, gateway and downtown Specific Plan proposals should be analyzed in the General Plan EIR.

The General Plan calls for separate Specific Plans to be prepared for these projects. Each of these Specific Plans will include the appropriate environmental review document which will address project-specific adverse impacts. Specific Plans and EIR's prepared subsequent to the adoption of the General Plan will be consistent with the General Plan EIR and will build upon the data base presented therein. Brooktrails' proposal for a "Northern Gateway" and other development concepts can be evaluated within the context of the Specific Plan process.

The availability of Brooktrails Redwood Park; a 2500-acre facility with hiking trails, lakes, golf course and other recreational amenities should be noted.

Comment acknowledged.

The option of lesser density development is not explored by the DEIR.

The practical effect of the mitigation measures contained in the EIR will be to reduce densities below levels which are feasible under the existing General Plan. Preservation of significant trees, riparian corridors and archaeological resources will, by necessity, result in a reduction in buildout densities. It is likely, therefore, that under the revised General Plan, development will occur at lower densities than was previously the case. Proposals to reduce allowable densities even further, if adopted, could have the effect of negating the developability of lands designated for residential, commercial and industrial use.

The proposal to convert Site #6 on Exhibit 3-2 from a residential to an industrial land use designation is presented without justification.

This site has been deleted from Exhibit 3-2.

Table 4.2-1 on Page III-8 describes gridlock.

Footnote #2 of the table and the accompanying text indicate that these calculations do not include the mitigation measures contained in the report. With the measures provided, LoS at the intersections shown on the table will remain within the established minimum standard (D).

No Circulation Network Alternatives are discussed in the DEIR.

This is not the case. The Circulation Network Description, contained in Volume II, Chapter 4 of the General Plan Technical Appendices and cited by footnote #2 on Table 4.2-1 of the DEIR, includes an analysis of twelve different Circulation Network Alternatives based on circulation, economic and environmental criteria. Also included in this section is a discussion of the criteria upon which the ranking of the various alternatives is based. Circulation criteria are based on traffic volume and LoS estimates included in the TJKM traffic study. Environmental factors considered included the Caltrans preliminary environmental constraints map and field observation of the various locational alternatives. The economic ranking was based on the consultant's estimate of the effect each alternative would have on employment generation and downtown revitalization, the City's two main economic development objectives.

Additional analysis of the traffic impacts of various US 101 bypass/interchange alternatives is needed in the Final EIR.

This analysis can be conducted and may be a desirable byproduct of future joint planning efforts by Willits and Brooktrails. Such analysis, however, is not necessary at this time, since the preferred interchange option has been deleted pending further consultation with Brooktrails and Caltrans. Since the existing traffic study contains data pertaining to

twelve different bypass/access alternatives, it provides a data base for reviewing these options. Additional alternatives can be added to the model, since both Willits and Brooktrails have employed the same traffic consultant. Should an alternative other than that recommended by the General Plan consultant be adopted, Mitigation Measure 4.239 can be revised to direct roadway network improvements to the appropriate intersection. The remaining mitigation measures would remain intact.

Little Lake Valley is in violation of State standards for PM₁₀; air quality impacts not adequately addressed.

This is noted as an existing condition by the DEIR. To the extent that growth planned under the preferred General Plan scenario would exacerbate this existing condition, the impact has been found to be insignificant. The basis of this finding is that the estimated additional pollutant emissions resulting from the preferred growth scenario will not be greater than one percent of the County's average daily emissions and would not, therefore, violate the significance standard established by the Mendocino County Air Pollution Control District. Section 15064(i) of CEQA is clear regarding the standard of significance for air pollutants, stating that "If an air or water discharge meets the existing standard for a particular pollutant, the Lead Agency may presume that the emission or discharge of the pollutant will not be a significant effect on the environment." The commentator has correctly noted that Table 4.3-2 contradicts the statement that "the estimated additional pollutant emissions from any of the Willits growth scenarios would not constitute a significant impact". Table 4.3-2 inaccurately combines the increase in natural gas and wood stove emissions with the projected total vehicular emission under buildout conditions for each scenario. Therefore, Table 4.3-2 is now represented by Table 4.3-2A and 4.3-2B attached. As shown in these tables, none of the proposed scenarios would result in increases in criteria pollutants above one percent of the total county emissions. The State Air Resources Board and the Mendocino Air Pollution Control District were included in the noticing for the DEIR and have not expressed substantive concerns regarding the project.

TABLE 4.3-2A: ESTIMATED TOTAL VEHICULAR EMISSIONS UNDER EXISTING AND FUTURE (2020) CONDITIONS

	(TONS/DAY)				
	CO	NOx	SOx	PM ₁₀	TOG
Existing	4.68	0.99	.11	.53	.54
Scenario 1	3.98	1.07	.12	.53	.45
Scenario 2	3.89	1.05	.12	.52	.44
Scenario 3	4.4	1.19	.14	.54	.49

TABLE 4.3-2B: ESTIMATED ADDITIONAL POLLUTANT EMISSIONS FOR BUILDOUT (2020)

	(TONS/DAY)				
	CO	NOx	SOx	PM ₁₀ ¹	TOG ²
Scenario 1					
Vehicular	-.70 ⁵	.08	.01	0.0 ⁶	-.09
Natural Gas ³	.003	.0122	.0001	.0005	.0008
Wood Stoves ⁴	.0417	.0012	.0002	.0070	.023
Totals	-.66	.09	.01	.01	-.07
Scenario 2					
Vehicular	-.79	.06	.01	-.01	-.10
Natural Gas	.0024	.0094	.0001	.0001	.0006
Wood Stoves	.0316	.0008	.0002	.0053	-.0174
Totals	-.76	.07	.01	-.005	-.08
Scenario 3					
Vehicular	-.28	.20	.03	.01	-.05
Natural Gas	.0023	.0257	.0002	.0009	.0017
Wood Stoves	.0878	.0023	.0005	.0146	.0484
Totals	<u>-.19</u>	<u>.23</u>	<u>.04</u>	<u>.03</u>	<u>.0001</u>
County Emissions	85	23	3.2	33	25

1 For natural gas emissions, this number represents total particulate matter.

2 For wood stove emissions, this number represents total methane and non-methane organics.

3 Assumes that all new homes in Willits would heat with natural gas

4 Estimates that 63 percent of rural homes burn 2.6 cords of wood per year (Sierra Research, 1989)

5 Decreases in emissions reflect adjustment in model for future lower emission cars and fuels.

6 Reflects no increase over existing conditions.

Mitigation Measure 4.334 and Policy 3.370 do not seem to be the same.

The policy and mitigation measure are essentially similar; the Ordinance establishing requirements for newly installed and retrofitted wood-burning stoves can be worded to resolve any perceived inconsistencies. The comment regarding the 1000-square foot threshold for requiring EPA-approved retrofitting is acknowledged. Council can direct that this standard be reduced in the Ordinance if it so desires.

The DEIR lacks estimates of water consumption and analysis of wastewater treatment needs for the alternative growth scenarios.

Section 4.620 of the DEIR provides an estimate that the preferred growth scenario will result in a 33 percent increase in water consumption and concludes that the City has sufficient capacity to meet the project increase in demand. The reduced growth scenario included in the Background Report would result in an estimated 22 percent increase in water consumption, which is also within existing capacity. The increased growth scenario would result in a 49 percent increase in water consumption, which would exceed the capacity of the existing water delivery system. Regarding wastewater generation, either of the three scenarios analyzed in the Background Report could be accommodated by the expanded wastewater treatment facility.

Effects of wastewater treatment plant expansion not addressed by DEIR.

A separate environmental review document will be prepared for this project at the time a proposal is submitted by the City.

No analysis of Brooktrails growth policy impacts upon biological resources is offered.

Biological impacts of projects proposed under the General Plan will be evaluated on a case-by-case basis, based on site-specific project characteristics. This evaluation will include field observation by wildlife biologists and botanists where appropriate. Biological impacts of Brooktrails development projects will be assessed as part of the City's review of Brooktrails' environmental reports.

Mitigation Measure 4.731 seems to require site-specific review for all residential development.

This is true, although in many cases a preliminary review by the Community Development Director will be sufficient to satisfy this requirement. For projects on lands containing potentially significant natural resources, a more rigorous site review may be required.

Visual resources section should include design review standards.

Such standards would be a desirable follow-up to approval of the General Plan. The standards can be formulated using the mitigation measures contained in Section 4.830 as a guideline. Detailed standards such as those necessary for design review are best suited for ordinances, rather than inclusion in the General Plan.

Exhibit 10-1 fails to include the area impacted by the Commercial Street interchange.

This interchange has been deleted pending further consultation with Brooktrails and Caltrans.

Exhibit 10-1 should be expanded to cover the Little Lake Valley.

This area falls outside of the City Limits, but can be addressed through the Sphere of Influence Plan to be prepared in accordance with LAFCO guidelines. (See previous response regarding Sphere of Influence.) Additional sites may be added to Exhibit 10-1 at any time at the discretion of the City Council.

Mitigation Measure 4.733 should be reconciled with Implementation Measure 3.360.

Reconciliation is not necessary, since the two statements cited do not contradict one another.

The DEIR section on Unavoidable Adverse Impacts does not conform to the requirements of Section 15126(b) of the CEQA Guidelines.

The section cited by the respondent is reprinted verbatim below:

- (b) Any Significant Environmental Effects Which Cannot be Avoided if the Proposal is Implemented. Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

We believe that Section 5.100 meets the above requirement.

The discussion of Growth-Inducing Impacts does not conform with the requirements of Section 15126(g) of the CEQA Guidelines.

The discussion of growth-inducing impacts is, by necessity, general, since it is unknown whether, when and where actual future growth conforms to the

section of the CEQA Guidelines cited. As indicated by the text, the General Plan Revision will have the effect of managing and directing, rather than inducing future growth.

The discussion of Cumulative Impacts does not conform to Section 15130 of the CEQA Guidelines and should include impacts from all cumulative expected growth in the Ukiah Valley, Little Lake Valley, the Laytonville-Covelo area and Fort Bragg-Mendocino Coast area.

The section of CEQA cited by the respondent states that the discussion of cumulative impacts "should be guided by the standards of practicality and reasonableness" and "need not provide as great detail as is provided of the effects attributable to the project alone." The CEQA Guidelines go on to say that the discussion of cumulative impacts should include "a reasonable analysis of the cumulative impacts of the relevant projects."

Section 5.300 of the DEIR includes projections of future growth associated with Willits and Brooktrails under various growth scenarios. Since these two jurisdictions will encompass the vast majority of future growth in the vicinity of the project area, their inclusion is sufficient to meet the requirements of CEQA Section 15130. Including the areas proposed by the respondent in the Cumulative Impacts section would go beyond the reasonableness provision of the CEQA guidelines.

The sections of the DEIR pertaining to the Relationship Between Short-Term Uses and Long-Term Productivity and Significant Irreversible Environmental Changes Resulting From Project Implementation are meaningless and do not conform to the CEQA Guidelines.

Since no specific shortcomings in this regard were cited by the applicant, a detailed response to the comment cannot be prepared.

The DEIR does not contain a discussion of a range of feasible alternatives to the project.

The alternatives section of the report includes all CEQA-mandated alternatives, including no project, similar development at another location, unlimited growth and development under existing zoning. In addition, three alternative growth scenarios were discussed in the Background Report (see pages II-25 through II-28). These scenarios were included in the traffic and air quality studies and the assessment of cumulative impacts, contained in the DEIR. In short, a reasonable range of alternatives has been considered as part of the General Plan Revision process.

A Statement of Overriding Consideration is required to certify the EIR.

In the opinion of the General Plan Consultant, the adverse impacts of the revised General Plan are effectively mitigated by the measures contained in the EIR. Should the Council determine that this may not be the case, a Statement of Overriding Considerations can be adopted for the proposed project.

The EIR contains insufficient analysis of the Willits Airport.

The General Plan Revision calls for a Specific Plan to be prepared for this facility. At the time the Specific Plan for the airport is formulated, the appropriate environmental review document will be prepared.

9.200 Letter from Joanne Moore, dated April 24, 1992

This Plan's treatment of the Brooktrails area was inadequate.

All pertinent Brooktrails planning and environmental documents were reviewed as part of the General Plan revision process. Growth assumptions contained in these documents were incorporated into the General Plan EIR. Brooktrails' traffic consultant, TJKM, was retained by the City in an effort to achieve consistency in the traffic analyses prepared by the two jurisdictions. Various Brooktrails growth scenarios were included in the analysis of General Plan growth alternatives. Numerous policies contained in the Plan directly address the issue of Brooktrails growth. In short, the degree of consideration given to Brooktrails growth issues was more than adequate under the provisions of CEQA. The fact that Township representatives disagree with certain conclusions contained in the General Plan and EIR does not mean that the City of Willits ignored Brooktrails growth issues in preparing the General Plan.

The General Plan should include planning in regards to the Willits Watershed.

Reference to the Willits watershed was added to Section 4.610 of the DEIR at the recommendation of the General Plan Steering Committee. Policy 3.250 of the Conservation and Open Space Element calls for maximizing open space preservation outside of the lands shown on Exhibit 3-2. The effect of this policy will be to commit the City to preserving the watershed in its present, undeveloped state. Development of a comprehensive watershed management program may be a desirable objective for the City to pursue. Such a project, however, falls beyond the scope of the General Plan revision.

The need for the Southwest Annexation project is questionable.

The revised General Plan merely calls for consideration of such a project. Should this project go forward, a Specific Plan and Environmental Impact Report will be required and additional input from the public and affected agencies will be sought.

The proposed Commercial Street interchange is wrong. Other alternatives should be considered.

This interchange has been deleted from the Plan pending further consultation with Brooktrails and Caltrans. Additional alternatives may be considered as part of this consultation process.

Information and recommendations generated by the Traffic Advisory Committee should be included in the Plan.

See response to Brooktrails' letter regarding this matter.

Smaller, doable specific projects should be included in the Plan.

The General Plan calls for numerous specific projects and follow-up activities, including Specific Plans for the downtown and airport, a tree preservation ordinance, efforts to promote historic resources and local beautification efforts. Determination of the specifics of such programs is an implementation activity, not something which must be spelled out in the General Plan itself.

Agriculture should be included in the Economic Development Element.

Comment acknowledged.

Passenger trains should not be dismissed by the General Plan.

The General Plan does not recommend implementation of passenger rail (with the exception of the Skunk Train) because of its questionable cost-effectiveness and the tendency of passenger rail systems to promote commuting, which runs counter to the "self-sustaining city" concept.

The Eastern Gateway is a ghastly idea.

Policies supporting an Eastern Gateway have been deleted from the Plan pending further consultation with Brooktrails and Caltrans.

Plans for "executive homes" at the southern end of town and park and ride lots are inconsistent with the goal of a "self-sustaining community."

The proposed southwest annexation project will locate homes in closer proximity to lands designated for future employment growth, thus reinforcing the "self-sustaining city" concept. Park and ride lots may be used by both local employees and commuters; their inclusion is desirable as a means of mitigating adverse traffic impacts.

Accelerating the environmental review process for projects which generate employment growth is undesirable and of questionable legality.

The desirability of accelerated permit processing is certainly debatable; the City Council regards this approach as desirable in light of the City's economic development objectives. In any case, accelerated permit processing will only occur in accordance with the provisions of CEQA and other applicable laws.

The Northeast and Northwest corners of Commercial and Main Streets are not suitable for residential development.

State housing element law requires that sites suitable for residential development be identified. Inclusion of these sites is warranted based on the possibility that a mixed commercial residential project might be feasible at either location. The inclusion of these sites in the City's residential land inventory does not commit the City to develop them for residential use.

9.300 Letter from California Regional Water Quality Control Board, dated April 8, 1992

Measures contained in the DEIR do not adequately address the 100 to 1 dilution requirement for discharges into the Eel River.

Presently, the City is irrigating year-round to meet the 100 to 1 dilution requirement. The consulting engineer has estimated that under the preferred growth scenario a pond measuring 1800 by 1800 square feet and 18 feet deep would be needed to meet the requirement. Provisions for this pond are included in the wastewater treatment plant improvement program. In addition, plant improvements are underway to control outflow in order to assure compliance with dilution requirements. Ultimately, the City intends to comply fully with the Regional Board's Basin Plan.

9.400 Letter from Bob Whitney, dated April 20, 1992

The City of Willits has not officially requested Brooktrails Township to comment as a responsible agency.

Section 21069 of CEQA defines "Responsible Agency" as "a public agency, other than the Lead Agency which has responsibility for carrying out or approving a project." Brooktrails Township does not meet this definition, as it has no approval or implementation authority in this matter. The Township does, however, meet the definition of a "local agency which exercises authority over resources which may be affected by the project." Therefore, the consultation provisions of Section 15086(3) of CEQA apply to Brooktrails Township. These consultation requirements have been met by employing the same traffic consultant utilized by Brooktrails, receiving comments by the Township at two public hearings and revising the text based on comments received, extending the public review period to allow for additional consultation with Brooktrails and providing the agency with a written response to comments in a timely manner. Thus, the consultation requirements of CEQA have been met and the noticing requirements do not apply to Brooktrails, since it is not a "Responsible Agency."

9.500 Letter from Deborah Frank, dated April 25, 1992

Inconsistencies exist between Caltrans and TJKM traffic data.

This issue can be addressed as part of the consultation process agreed upon at the April 15, 1992 public hearing. Aspects of the preferred roadway network alternative pertinent to Brooktrails and Caltrans have been deleted pending completion of this consultation process.

The Mendocino County Air Pollution Control District was not notified of the EIR.

Correspondence from the State Clearinghouse indicates that the District was informed regarding the EIR.

The data cited by the air quality analysis do not pertain specifically to Willits.

Air quality data contained in the DEIR are derived from the nearest available monitoring stations. Plans are underway for local monitoring stations to be established. At the time data became available from local monitoring stations, such information can be added through a General Plan Amendment and Supplemental EIR, if necessary.

Brooktrails was not notified.

See previous response to Bob Whitney regarding this matter.

9.600 Letter from Willits Environmental Center dated April 28, 1992

The EIR fails to show why the reduced growth scenario is not the least environmentally damaging scenario.

Because the reduced project alternative would fail to generate sufficient revenues for necessary services and infrastructure improvements (water, sewer, traffic, etc...) it is not regarded as the environmentally preferable alternative. The preferred growth scenario represents an estimate of the minimum level of development necessary to provide adequate revenues for public service provision and maintenance of the local infrastructure. In the absence of growth of this magnitude, existing adverse environmental conditions such as traffic congestion and poor water quality cannot be effectively addressed. Moreover, existing levels of local public services are unlikely to be maintained under a reduced growth scenario, perhaps resulting in further environmental deterioration. Sustained, moderate population and household growth, if properly planned and managed, can provide revenues for improving existing environmental conditions while minimizing significant adverse environmental impacts.

The EIR fails to examine commercial or industrial growth

This is not the case. The EIR assumes that commercial and industrial growth will occur at approximately the same rate as future population growth. Under the three alternative growth scenarios analyzed in the background reports, industrial and commercial square footage is increased by the corresponding percentage increase in household growth for each scenario. This increased square footage is then allocated to existing parcels designated for commercial and industrial land use. Obviously, the specific nature and location of future commercial and industrial development in Willits cannot be precisely determined at this time, necessitating a generalized approach to forecasting such uses. Air quality impacts, for example, are impossible to estimate without advance knowledge of the nature and location of future commercial and industrial development. As individual development proposals are submitted for review and approval, site specific environmental analysis, including project-specific data pertaining to pollutant emissions will be conducted as mandated by the draft General Plan.

No evidence is presented which shows how any of these scenarios and their differing rates of growth can be compared to each project as they appear on the City Council agenda, or how the City Council can determine if any specific project meets the selected growth scenario. It is, therefore, likely that the growth rate will be determined not by the General Plan, but by the rate of project presentation to the City Council by property owners in the City or those wishing to annex to the City.

This is always the case in a free and democratic society. Only in a command economy would the determinative approach apparently advocated by the commentator be acceptable. The preferred growth alternative is intended to provide the Council with a general sense of direction concerning future population and household growth rates. Over time, the Council can determine whether existing policies are resulting in growth rates which approximate the preferred scenario and can modify development policies accordingly.

No evidence is presented which shows that impact fees will control undesirable growth as implied by the Plan consultant, or that such fees will mitigate the negative impacts such growth might bring. The report and Plan does not show how a City Council can tailor impact fees, new parks in residential areas, etc. to achieve any selected version of the scenario alternative.

Impact fees are not intended to "control undesirable growth;" they are meant to provide a source of funds to offset the adverse impacts of approved development. The General Plan, EIR and background reports

identify specific projects to be funded by impact fees, such as intersection improvements, wastewater treatment plant expansion and open space acquisition.

The experience of numerous communities suggests that financing such improvements with impact fees is an effective mechanism for addressing the adverse impacts of urban growth.

The impact discussion does not contain any baseline air quality information from Willits other than PM₁₀ even though O₃, SO₂, and NO₂ are priority pollutants in California air quality standards.

The commentator accurately notes that the air quality impact discussion does not contain any baseline air quality information from Willits other than PM₁₀. As is stated in the EIR, air quality monitoring does not occur in Willits for any of the criteria pollutants except for PM₁₀. The Mendocino Air Pollution Control District was contacted for the best available ambient air quality data. These data are presented in the EIR.

The EIR does not mention the frequent episodes of pollutant magnifying night and early morning fog.

Section 4.312 discusses the frequent episodes of night and early morning fog and accompanying inversion events.

The EIR includes a table which indicates that each growth scenario produces significant increases in pollutants

(See response to Brooktrails letter regarding this matter, which corrects the erroneous data contained in Table 4.3-2 of the DEIR. Based on the corrected analysis, no significant adverse air quality impacts are forecast under the preferred growth scenario).

The Plan is silent on how the suggested circulation mitigation measures can reduce the predicted gridlock.

The traffic study prepared by TJKM Transportation Consultants indicates that, under the preferred growth scenario, mitigation measures contained in the EIR are sufficient to maintain signalized intersections at LoS "D" or better.

Numerous documents referred to in the Plan and used by the consultant to justify some of his conclusions, are missing from the Plan and EIR. For example, the consultant refers to 101 bypass environmental studies by Caltrans. These studies are not now available to the public, since the EIR of the 101 bypass of Willits will not be available for public comment

until 1993. CEQA does not allow the General Plan consultant to make conclusions based on secret or difficult-to-obtain information.

The preliminary environmental analysis referred to in the EIR consisted of a constraints map which was reviewed by the General Plan consultant at a public meeting attended by the commentator. Other background reports referred to in the EIR are available for public review at the City Planning office. The decision to omit technical background reports from the EIR document was based on a desire to reduce reproduction costs, thereby making the document more affordable to the public while enabling those with an interest in the background reports to have access to them. This approach is permitted by CEQA, as indicated by the following excerpt from Section 15150(a) of the CEQA Guidelines:

"An EIR or Negative Declaration may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR or Negative Declaration."

The Hydrology Section of the EIR does contain figures on present water use in Willits, but does not provide any information to show how the proposed mitigations including water-saving toilets and shower heads combined with a theoretical expansion of the sewer plant, will allow the proposed 33 percent increase in residential water use.

The technical studies which formed the basis of the conclusion that projected increases in water usage can be accommodated are cited in Volume 2, Section 11.100 and incorporated by reference in Section 4.620 of the EIR. In addition, the Chief Water Plant Operator has expressed concurrence with the opinion that the level of future residential growth proposed under the preferred scenario can be accommodated.

The EIR fails to analyze potential industrial and commercial water use.

Based on estimates contained in the aforementioned technical reports, up to 1,845 additional dwelling units can be accommodated by the available water supply. The preferred growth scenario calls for an increase of 826 units, leaving additional capacity for commercial and industrial expansion. The EIR does not attempt to quantify future commercial and industrial water use, since the nature and location of future commercial and industrial growth cannot be estimated with the same level of precision as future residential growth. As individual proposals for such development are submitted, site-specific water usage estimates will be generated. Projects which would increase water usage beyond the level of availability will not be approved unless access to additional water supplies can be assured.

Sixty decibels is not a tolerable noise level for residential areas.

Policy 4.210 of the Noise Element calls for maintaining noise levels of 55 dBA in residential areas. Policies 4.220 and 4.230 call for noise attenuation for noise sensitive land uses in areas with ambient noise levels in excess of 60 dBA. These standards are generally accepted throughout California and can be found in many local General Plans.

9.700 Letter from Division of Mines and Geology dated April 24, 1992 and April 30, 1992

On page III-21, the statement, "All new construction is required to meet minimum seismic safety standards" does not indicate which standards are to be used for construction or how the standards will be implemented. We recommend that the latest version of the Uniform Building Code be used as a minimum, unless the City has adopted its own more stringent requirements. This comment also applies to page I-11, Safety Policy 7.280.

Comment acknowledged. UBC will be utilized as a basis for determining minimum seismic safety standards.

On page III-21, Mitigation 1.001 incorrectly states that a licensed engineer can prepare geologic and seismic reports. Legally, those reports must be prepared by a registered geologist or certified engineering geologist.

Correction acknowledged.

DMG feels that the county-wide Geotechnical Hazard Zones described between pages II-82 and II-86 of the Safety Element are too general to be useful in defining local hazards. If the City wishes to retain the regional geotechnical descriptions, then "hazard" should be deleted. We recommend that the term "hazard zone" be restricted to local areas with special hazard conditions, such as the floodway and Alquist-Priolo Special Studies Zones as mapped on the Community Safety Map. Such zones, as defined in the Safety Element have legal implications.

The discussion of countywide geotechnical hazard zones is included in the General Plan Technical Appendices as background information. As noted by the commentator, seismic hazard zones in Willits are limited to Alquist-Priolo Special Study zone which is delineated on the Community Safety Map.

The western upland portion of the City is composed of steep slopes underlain by Franciscan bedrock which may be susceptible to landslide hazard. A geotechnical evaluation would include a description of the geologic units, estimated depth of weathering, fracturing and jointing conditions, soil saturation conditions, and landslide history. These factors would help to determine overall slope stability for planning and land use.

Site-specific geotechnical investigation will be required for projects proposed in this area. These studies, to be conducted at the expense of the applicant, will provide more detailed information concerning existing geologic conditions.

The valley floor is underlain by Plio-Pleistocene non-marine sedimentary rocks and Quaternary alluvium. DMG believes that because of the high seasonal ground water table and potential for strong seismic shaking, the valley sediments may be vulnerable to liquefaction hazard. The City may wish to include a map showing the depth to ground water in order to delineate the potential hazard area.

Although this information could prove to be useful, it is not included in the General Plan, since future growth is not proposed east of the existing incorporated area on the floor of the valley. Since the majority of the valley floor is under Mendocino County jurisdiction, such analysis, if required, should be conducted under the auspices of the County.

We have included below a suggested rewrite of the last paragraph on page II-79 of the Safety Element which should improve the accuracy of the discussion on earthquakes.

An Active fault is one which has had surface displacement within Holocene time (last 11,000) years). A potentially active fault is defined as any fault which has had surface displacement during Quaternary time (about last 2,000,000 years). Intervals between earthquakes (or recurrence intervals) have been investigated successfully using paleoseismic information. However, earthquake occurrences cannot be predicted accurately using recurrence intervals.

Clarification acknowledged.

9.800 Letter from California Department of Transportation dated May 21, 1992

We are concerned that the timing for endorsement of the bypass alignment may result in conflicts or an inconsistent General Plan for the City should another alignment be selected. The General Plan identifies several locations within the City where residential growth should be planned and

accommodated. Several of these planned growth areas may be precluding bypass alignment options by encouraging growth and inflating land values beyond a practical reach for right-of-way acquisition.

The preferred bypass alignment and interchange location have been deleted from the General Plan pending further consultation with Caltrans, Brooktrails and other affected agencies. Future growth in Willits is expected to occur primarily west of U.S. 101. Therefore, eastern bypass alignment options will not be precluded as a result of future planned growth. Although development west of U.S. 101 could have an effect in the feasibility of a west side bypass, the City contends that this alternative will ultimately be rejected based on environmental and cost considerations.

In the interim, prior to construction of the Willits bypass, there could be considerable impacts from growth and increased traffic on the level of service and safety for through traffic and intersection operation on the existing alignment. These interim impacts would be compounded by the lack of planning for through access and north-south parallel corridors within the City limits. We are concerned that major intersections may operate at level of service "F" under a number of mitigated alternatives in the traffic study. This indicates that there may be a need for one or more additional city streets parallel to existing Route 101 even if a new freeway facility is constructed.

Proposals for development in the interim period prior to construction of the U.S. 101 bypass will not be approved if analysis indicates that approval will result in intersection service levels worse than LoS "D". Parallel roadways to U.S. 101 may be included in the design of future development projects, particularly in the Southwest Annexation Area. Project applicants shall have primary responsibility for financing mitigation of interim traffic impacts. As indicated by the Mitigation Monitoring Program, the City Council, through the Community Development Director, will have responsibility for administering and monitoring traffic mitigation measures.

The City should consider a traffic impact mitigation plan based on increasing traffic impacts from development and growth in Willits rather than relying on the Willits bypass as mitigation for additional development related traffic.

The General Plan EIR contains numerous mitigation measures in addition to the U.S. 101 bypass. Such measures include intersection improvements, traffic impact fees, bicycle storage requirements, park and ride lots and expanded bus service. Thus, the City will not be relying upon the bypass in order to mitigate adverse traffic impacts.

We are concerned about the impacts of planned growth on the drainage system and the need for mitigation of impacts. Section 4.610 of the Draft

General Plan refers to capacity limitations of storm drains, which we have been consistently noting in our reviews of development in Willits. Section 4.620 does not address the impact of additional development and Section 4.630 does not identify any mitigation to correct these deficiencies.

Analysis and mitigation of adverse drainage impacts will be required as a condition of approval for projects submitted under the revised General Plan.

The traffic analysis identifies several intersections where additional turning lanes will be needed to accommodate increases in traffic from residential and commercial growth in Willits. These recommended turning lanes were not accompanied by added lanes for the traffic to turn onto.

Mitigation measures were determined under the twelve circulation alternatives for each of the three study intersections. Lane modifications were recommended which would improve the intersection level of service. In some cases, additional left-turn lanes would require a corresponding additional through lane to turn onto followed by a merge to one lane. In other cases, it may be justified to carry the additional through lane to the next intersection.

Because the traffic analysis by TJKM was centered on the intersection operation, "planlines" for through roadway segments were not determined. The development of roadway planlines would be the next appropriate planning step after the General Plan process.

9.900 Letter From Don and Maryl Morris dated July 16, 1992

The Willits General Plan Revision is clearly a growth-inducing project since it prioritizes commercial/industrial development based on a preferred growth scenario, yet the EIR asserts (with no supporting documentation) that substantial growth will occur with or without the adoption of a revised General Plan.

The preferred growth scenario is based on the consultant's estimate of the level of growth which is likely to occur and is not, therefore, growth-inducing. Factors upon which this alternative scenario is based include countywide growth projections from the State Department of Finance, national, state and local economic conditions, expected growth rates at Brooktrails and local policies regarding growth and development. Section 2.320 of the General Plan Technical Appendices discusses the underlying assumptions of the three alternative growth scenarios.

Had the City Council chosen the more rapid growth alternative and included policies in the General Plan to facilitate increased growth, the Plan could be construed as growth-inducing. Under the preferred scenario,

however, the City is seeking merely to direct future growth to areas which are best suited for it.

The assertion that substantial growth will occur with or without the revised General Plan is supported by the fact the the City has been receiving numerous inquiries from property owners and developers who will soon be coming forth with residential development projects. These projects will be submitted and, if adopted, the City will grow substantially regardless of the status of the General Plan revision effort. Adoption of the revised General Plan will enable the City to review future development proposals within the context of a more rigorous set of environmental review procedures. It will also enable the City to assess impact fees to offset the cost of providing services to newly developed areas. In short, the revised General Plan seeks to manage, rather than induce, future growth.

The project specifically proposes to help facilitate growth beyond the City limits in Brooktrails, but the EIR fails to adequately consider the secondary effects and cumulative impacts of that growth.

The environmental impacts of future Brooktrails growth are to be analyzed by EIRs prepared under the auspices of Brooktrails Township, which is the Lead Agency on such matters. The City of Willits, as a Responsible Agency, has provided comments on draft EIRs produced by Brooktrails and will continue to do so as these reports are drafted and amended. Section 5.300 of the General Plan EIR provides an analysis of cumulative growth which includes an increase of approximately 2,700 units in Brooktrails by 2020. Representatives of the Township have indicated that this is a reasonable assumption regarding future Brooktrails growth. This growth factor was incorporated into the traffic, noise and air quality analysis upon which the mitigation measures are based.

The preferred growth scenario projects a 50 percent population increase in Willits and a 180 percent increase in Brooktrails, yet the significant irreversible environmental impacts from Brooktrails growth are not adequately addressed in the EIR.

Refer to previous response.

The EIR concludes that the cumulative effect of a 50 percent population increase in Willits over the duration of the planning period could irreversibly alter the City's small town rural character (EIR, Sec. 5.5).

Comment acknowledged. It is reasonable to assume that some changes in community character will occur over a 28-year period. The present character of Willits is clearly different now than it was in 1964; it is equally likely to change substantially between 1992 and 2020. This likelihood is merely acknowledged by the General Plan EIR.

The plan admits that the "the environmental quality of Willits is one of the community's most attractive features", yet the preferred alternative, if implemented, would have significant irreversible impacts on this environmental quality (EIR, Sec., 5.4 & 5.5).

No plan which makes an honest attempt to look forward more than 20 years into the future of a community can conclude anything other than that some irreversible impacts on environmental quality will occur. The question is whether these adverse impacts can be mitigated to an acceptable level. By adopting the General Plan and certifying the Environmental Impact Report, the City Council will be expressing its judgment that the adverse impacts which have been identified can be mitigated to an acceptable level by measures contained in the EIR. It would be impossible for the City to attempt to adopt a General Plan with absolutely no significant adverse environmental impacts. The City Council has acknowledged that some degree of growth is necessary in order to sustain the local economy and that this growth carries with it certain environmental trade-offs.

The EIR fails to consider a full range of reasonable alternatives as required by CEQA. The plan presents essentially one alternative based on three growth scenarios.

The EIR analyzes a range of growth alternatives, with annual growth rates ranging from 1.0 percent to 2.5 percent and buildout populations ranging from 6,680 to 10,244. The EIR also includes analysis of the State-mandated "no project" alternative, the possibility of similar growth occurring at another location and the implications of continuing growth under existing land use and zoning policies. The various alternatives are presented in less detail than the preferred scenario. This is consistent with Section 15126(d) of the CEQA Guidelines, which states that "the significant effects of the alternative shall be discussed but in less detail than the significant effects of the project as proposed."

Regarding the range of alternatives analyzed, the CEQA Guidelines (Section 15126(d)(5)) provide further edification:

"(5) The range of alternatives required in an EIR is governed by "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The key issue is whether the selection and discussion of alternatives fosters informed decision-making and informed public participation. An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative."

Based on the above cited sections of CEQA, both the range of alternatives discussed and the content of the analysis are consistent with the standards established under State environmental law.

To comply with CEQA, the EIR should fully analyze an alternative which preserves our small town rural character while providing for reasonable economic development. This alternative should recommend internal solutions to our traffic problems without depending on a freeway bypass.

The preferred growth scenario, in the judgment of the City Council, preserves the City's small town character to the greatest extent possible while allowing for the fact that some degree of future growth must occur in order to maintain the City's fiscal and economic viability. Regarding the freeway bypass, a no-bypass alternative was included in the analysis of all three alternative growth scenarios. In every case, including the slow growth alternative, failure to construct a freeway bypass would exacerbate existing traffic, noise and air quality problems beyond the levels forecast under the preferred growth scenario with the freeway bypass. Neither of the no-bypass growth scenarios resulted in the emergence of an environmentally preferable alternative.

The EIR (Section 5.4) assumes, with no basis in fact, that long-term environmental degradation is the price we will have to pay for short-term economic growth.

Comment acknowledged. The section cited simply notes that "some degree of adverse impact is probably unavoidable, in light of the City's need to promote tax-generating population and economic growth." The factual basis of this assertion is set forth in the economic analysis (Volume 2, Chapter 1.000) which established the underlying assumptions of the General Plan revision effort.

To sacrifice quality of life for economic development as proposed by the preferred alternative is a prescription for ultimate economic disaster. Vital, healthy communities provide suitable environments for sustainable economic development. When inappropriate growth reduces quality of life, the social and economic vitality of a community eventually declines.

The above sentiments are similar to those expressed in Section 3.000 of the EIR, which calls for achieving the objective of a "self-sustaining City." The commentator, however, has presented no evidence that a 1.7 percent annual growth rate, tempered by sound environmental review procedures, will result in "inappropriate growth" which reduces the quality of life. In fact, the evidence would suggest that a moderate amount of growth can be accommodated by the existing local infrastructure without adversely affecting the quality of life in Willits.

The preferred alternative anticipates an increased land use intensity in certain areas designated for residential, commercial, and industrial use, but the EIR fails to adequately analyze the direct, secondary, and cumulative impacts of this increased land use intensity.

In the absence of specific examples from the EIR, it is difficult to formulate a substantive response to this comment. It should be noted,

however, that future increases in land use were assigned, for the most part, to sites already designated for the land uses in question. Based on this assignment, the report analyzes the direct, indirect and cumulative impacts of the preferred growth alternative. Should proposals be submitted in the future which deviate substantially from the assumptions contained in the General Plan EIR, supplemental environmental analyses will be required.

The areas where increased land use intensity will likely occur should be identified in the plan - with all potential impacts discussed and mitigations proposed.

The areas within the existing City limits where growth is likely to occur are identified on Exhibit 3-1, which identifies the existing land use designations within which future growth can be expected to occur. The areas outside of the City where future growth is likely to occur are shown on Exhibit 3-2.

Projected increases in commercial, industrial and residential land uses were primarily assigned to sites which are already designated for such uses. The distribution of future increases in land use intensity was based on the suitability of existing lands designated for development, the presence or absence of environmental constraints, such as riparian habitat and the limited amount of knowledge presently available concerning the future intentions of existing land owners. As individual development projects are submitted for review and approval, assumptions regarding future growth patterns can be adjusted if necessary.

The EIR identifies the proposed 101 bypass as a mitigation measure for circulation, air quality, and noise impacts, but it totally discounts the negative impacts the bypass will have on the City and surrounding areas. The EIR assumes, incorrectly, the environmental impacts shifted beyond the City limits do not require analysis or mitigation measures.

This is not the case. The environmental impacts of the bypass which may occur outside the City limits are being analyzed by Caltrans, which is the Lead Agency for the bypass project. The City of Willits, as a Responsible Agency, will review the Caltrans environmental analyses for their accuracy and completeness and will request additional analysis where necessary.

The effects of the bypass within the City of Willits are analyzed by the General Plan EIR, based on the information which was available at the time the report was written. Should the Caltrans EIR identify impacts within Willits which are not adequately addressed by the General Plan EIR, revisions to the document may be necessary.

The land use element prioritizes commercial and industrial development over residential development, but the EIR is based on the assumption that

commercial and industrial development will occur at the same pace as residential growth.

This assumption is based on the premise that residential growth will occur with or without incentives, but that commercial and industrial development will require a high priority in order for it to occur at the same pace as residential growth. By designating commercial and industrial development as top priorities, the City hopes to ensure that such development will keep up with local residential growth. This is necessary in order for the City to avoid becoming a "bedroom suburb."

The Land Use Element prioritizes infill development of vacant and underutilized land within the City limits--a good idea--but it may conflict with the goals and policies of other elements. For example, the Conservation and Open space Element emphasizes the preservation of open space, and the Parks and Recreation Element encourages the equitable distribution of parks and recreation facilities throughout Willits. Healthy, vital communities need accessible green space for all residents.

Infill development of vacant and underutilized land is not incompatible with the objectives of preserving open space and distributing parks more equitably throughout the City. Infill sites can be developed which include public access open space as prominent features. Park impact fees generated by infill development can be used to redress existing inequities in the distribution of public access open space. Designating infill development as a priority does not commit the City to developing all existing vacant sites.

The goal of the Noise Element is to preserve the existing community noise environment, while minimizing the exposure of Willits residents to potentially harmful noise levels. Yet, the EIR predicts significant irreversible noise impacts if the Plan is implemented.

The EIR acknowledges that significant increases in noise could occur under the preferred growth scenario. The mitigation measures contained in the report are intended to minimize these impacts by requiring design features which reduce the effects of noise generation and by directing noise-generating land uses away from sensitive receptors, such as homes, schools and hospitals. Overall, the General Plan and EIR serve to mitigate noise impacts to an acceptable, although not insignificant level.

The proposed expansion and industrial development of the Willits Airport violates the Land Use Compatibility Chart for Community Noise Environments since the airport is surrounded by residential land uses.

The General Plan revision does not call for any specific land uses at the Willits Airport. Rather, it calls for a Specific Plan to be prepared for

this site. Noise impacts associated with the various land use alternatives to be considered as part of the Airport Specific Plan process will be evaluated in the EIR to be prepared for the Specific Plan.

The Housing Element policy of encouraging multi-family residential development on lands designated for commercial use is contradicted by the land use policy which prioritizes commercial and industrial development over residential development.

These policies are not incompatible. In fact, policy 5.220, which calls for encouraging multi-family and mixed commercial/residential development on lands designated for commercial uses, illustrates the compatibility of multi-family, residential and commercial land uses.

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